



GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT
COMMISSIONER OF INCOME TAX
CENTRAL CIRCLE 2,UDAIPUR

To,
DIPESH JAIN
188 TAGORE NAGAR , HIRAN MAGRI SECTOR-4
UDAIPUR 313002 , Rajasthan
India

PAN: ATWPJ7914R	A.Y: 2020-21	Dated: 20/02/2024	DIN & Notice No: ITBA/AST/S/148_1/2023-24/1061228035(1)
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Notice under section 148 of the Income-tax Act,1961

Sir/Madam/ M/s.

- I have information that a search was initiated under section 132 of the Act in your case or in the case of the person in respect of which you are the assessable under the Act on the date 23/11/2022.
This notice is being issued after obtaining the prior approval of the **PCIT (Central), Jaipur** accorded on date vide Reference No. **10000047610834**.
- I, therefore, propose to assess or reassess such income or recompute the loss or the depreciation allowance or any other allowance or deduction for the Assessment Year **2020-21** and I, hereby, require you to furnish, within **90** days from the service of this notice, a return in the prescribed form for the Assessment Year **2020-21**.

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR

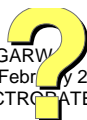
(In case the document is digitally signed please refer Digital Signature at the bottom of the page)

Note: If digitally signed, the date of digital signature may be taken as date of document.
AAVKAR BHAWAN, UDAIPUR, RAJAST, SUBCITY CENTRE, SAVINA, UDAIPUR, Rajasthan. 313001
Email: UDAIPUR.DCIT.CEN2@INCOMETAX.GOV.IN,

Note:- The website address of the e-filing portal has been changed from www.incometaxindiaefiling.gov.in to www.inco
* DIN-Documents identification No.

This document is digitally signed

Signer: AJAY AGARWAL
Date: Tuesday, February 20, 2024 11:38 PM
Location: DIRECTORATE, India





GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT
COMMISSIONER OF INCOME TAX
CENTRAL CIRCLE 2,UDAIPUR

To,
DIPESH JAIN
188 TAGORE NAGAR , HIRAN MAGRI SECTOR-4
UDAIPUR 313002 , Rajasthan
India

PAN: ATWPJ7914R	A.Y: 2021-22	Dated: 20/02/2024	DIN & Notice No: ITBA/AST/S/148_1/2023-24/1061228057(1)
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Notice under section 148 of the Income-tax Act,1961

Sir/Madam/ M/s.

- I have information that a search was initiated under section 132 of the Act in your case or in the case of the person in respect of which you are the assessable under the Act on the date 23/11/2022.
This notice is being issued after obtaining the prior approval of the **PCIT (Central), Jaipur** accorded on date vide Reference No. **10000047610935**.
- I, therefore, propose to assess or reassess such income or recompute the loss or the depreciation allowance or any other allowance or deduction for the Assessment Year **2021-22** and I, hereby, require you to furnish, within **90** days from the service of this notice, a return in the prescribed form for the Assessment Year **2021-22**.

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR

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Email: UDAIPUR.DCIT.CEN2@INCOMETAX.GOV.IN,

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Signer: AJAY AGARWAL
Date: Tuesday, February 20, 2024 11:38 PM
Location: DIRECTORATE, India





GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT COMMISSIONER
OF INCOME TAX
CENTRAL CIRCLE 2,UDAIPUR

To,
AKME FINTRADE INDIA LIMITED
4-5,SUBCITY CENTRE , SAVINA
UDAIPUR 313001,Rajasthan
India

PAN:
AABCA2962P

AY:
2018-19

Dated:
10/10/2023

DIN & Notice No :
ITBA/AST/F/142(1)/2023-24/1056935834(1)

आयकर अधिनियम, 1961 की धारा 142 की उप-धारा (1) के तहत सूचना
Notice under sub-section (1) of Section 142 of the Income Tax Act, 1961

महोदय/महोदया/मैसर्स
Sir/ Madam/ M/s,

निर्धारण वर्ष 2018-19 के लिए निर्धारण के संबंध में, आपको निम्न करने की आवश्यकता है:
In connection with the assessment for the assessment year 2018-19, you are required to:

- क) 17/10/2023 03:00 PM को या उससे पहले अनुलग्नक के अनुसार मांगे गए खातों और दस्तावेजों को प्रस्तुत करें, अथवा प्रस्तुत कराएं। या
- a) Produce, or cause to be produced, the accounts and documents called for as per annexure on or before 17/10/2023 03:00 PM or
- ख) अनुलग्नक के अनुसार और उसमें निर्दिष्ट बिंदुओं या मामलों पर मांगी गई जानकारी जो कि आयकर नियम, 1962 के नियम 14 के तहत निर्धारित तरीके से सत्यापित हो 17/10/2023 03:00 PM को या उससे पहले प्रस्तुत करें।
- b) Furnish the information called for as per annexure and on the points or matters specified therein and verified in the prescribed manner under Rule 14 of Income-tax Rules, 1962 on or before 17/10/2023 03:00 PM.
- ग) उपरोक्त साक्ष्य/सूचना आयकर विभाग की 'ई-फाइलिंग' वेबसाइट (www.incometax.gov.in) में आपके खाते के माध्यम से 'ई-प्रोसीडिंग्स' सुविधा में इलेक्ट्रॉनिक रूप से प्रस्तुत की जानी है। ई-फाइलिंग वेबसाइट (www.incometax.gov.in) पर 'ई-प्रोसीडिंग्स'/'पहचान विहीन निर्धारण' पर संक्षिप्त नोट उपलब्ध हैं।
- c) The above-mentioned evidence/information is to be furnished electronically in 'e-Proceedings' facility through your account in 'e-Filing' website of Income Tax Department (www.incometax.gov.in). Brief note

Note: If digitally signed, the date of digital signature may be taken as date of document.
,AAYKAR BHAWAN, UDAIPUR, RAJAST, SUBCITY CENTRE, SAVINA, UDAIPUR, Rajasthan, 313001
Email: UDAIPUR.DCIT.CEN2@INCOMETAX.GOV.IN,

on 'e-Proceedings'/'Faceless Assessment' are available on the e-Filing website (www.incometax.gov.in).

Yours faithfully,

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR



अनुलग्नक ANNEXURE

1. आयकर अधिनियम, 1961 की धारा 142(1) के तहत निम्नलिखित खाते या दस्तावेज या जानकारी मांगी गई है:
1. **The following accounts or documents or information is/are sought under section 142(1) of the Income-tax Act, 1961:**

In your case, you have filed original return of income for A.Y. 2018-19 on 27.10.2018 declaring total income of Rs. 154631190/-. The return of income was selected for scrutiny on various issues under Limited Scrutiny criteria. Assessment in your case was completed accepting returned income on 04.02.2021 u/s. 143(3).

1. It was noticed that you have made a provisions of Rs. 2274086/- in your books for NPA. While computing income under the head 'profit and gains of business or profession', you have added back the entire amount of Rs. 2274086/- debited in books for provision and claimed deduction of Rs. 8142602/- for provision for bad debt and doubtful debts u/s. 36(1)(viiia)(d) of the Act, whereas it was to be restricted to Rs. 2274086/- only, as per CBDT's Instruction No. 17/2008 dated 26.11.2008. **The omission had resulted in under computation of business income of Rs. 5868516/- (8142602 - 2274086).**
2. It was also noticed on perusal of Schedule-18, other expenses of the P&L Account that you have debited an expenditure as bad debts/written off amounting to Rs. 9058137/-. Further, as per Schedule-7 of the Balance sheet, liabilities side, there was a credit balance of Rs. 4366273/- in the 'Provision for bad and doubtful debts' at the beginning of the previous year. Hence, as per above provision, the bad debt/written off, first should have been debited to the account of provision for bad debt and doubtful debts upto Rs. 4366273/- and rest bad debts/written off amounting to Rs. 4691864/- (9058137-4366273) should have been debited in P&L Account, but the same was not done by you. **The omission had resulted in under computation of business income of Rs. 4691864/-.**

The above issues have not been considered and examined by the Assessing Officer which resulted into under assessment of Rs. 5868516/- and Rs. 4691864/- on account of above issues. Therefore, the Hon'ble PCIT, Udaipur had initiated proceedings u/s. 263 of the Act and after considering your submission and material placed on record, by passing order u/s. 263 dated 02.03.2023, the order passed u/s. 143(3) of the Act by the AO has been set aside.

You are therefore, requested to furnish your explanation on the above

issues with relevant documentary evidences and also requested to show cause as to why the above additions should not be made in your hands.

3. It is relevant to mention here that search and seizure action u/s. 132 as well as survey 133A were conducted at Akme and Ankur Group on 23.11.2023. During search and survey proceedings as well as post search proceedings, it has been noticed that Akme Fintrade India Limited has issued shares to different shareholders in various financial years. In the post search proceedings, the details of shares issued were obtained which are tabulated below-

FY	Date	No. of Shares issued	Face Value	Premium
2016-17	09-06-2016	69230	10	100
2016-17	10-08-2016	117120	10	100
2016-17	03-10-2016	178570	10	100
2016-17	03-12-2016	103040	10	115
2016-17	01-02-2017	76942	10	190
2016-17	31-03-2017	142240	10	190
2017-18	05-06-2017	253684	10	240
2017-18	03-08-2017	118980	10	240
2017-18	03-10-2017	14337	10	390
2017-18	23-12-2017	7040	10	615
2017-18	03-03-2018	21920	10	615

2017-18	31-03-2018	90251	10	790
2018-19	30-05-2018	24236	10	790
2018-19	28-07-2018	53415	10	790
2018-19	29-09-2018	44876	10	790
2018-19	30-03-2019	24625	10	790
2019-20	21-06-2019	2100	10	790
2019-20	25-07-2019	580	10	790
2019-20	24-09-2019	2000	10	790
2019-20	26-12-2019	6250	10	790
2020-21	11-12-2020	10000	10	190
2020-21	30-01-2021	50000	10	190
2020-21	11-03-2021	72700	10	190
2020-21	31-03-2021	72700	10	190

As can be seen from the above table, the shares were issued at a huge premium consistently. It is also noticed that issue price of these shares ranges from as high as Rs. 800 to as low as Rs. 110. There is huge fluctuation in the issue price of shares in a very short span of time. It is seen that shares were issued at premium of Rs. 615/- per share on 03-03-2018 & premium of Rs. 790/- on 31-03-2018. This shows increase in per share price by Rs 175/- within a period of 28 days. Similarly, shares were issued at premium of Rs 790/- on 26-12-2019, which came down to Rs. 190/- per share on shares issued on 11-12-2020. This shows that per share price of the shares came

down by Rs. 600/- within period of one year.

Accordingly, this issue was confronted to Shri Nirmal Kumar Jain, and he was required to furnish valuation method applied on different dates along with supporting evidence. He was also required to explain the reasons behind so much fluctuation in the share prices issued over a period of time. The relevant part of the statement is produced below:

Q194-Kindly submit the method of valuation of shares of M/s AkmeFintrade (India) Limited done under Rule 11UA. Also furnish the documents related to valuation of shares of M/s Akme Fintrade (India) Limited.

Ans : Under the Income Tax Rules, two methods are prescribed and option is given to the assessee. We opted for valuation as per valuation done by the CA or the merchant banker method, as the case may be and there is no difference. I will produce the valuation report of shares of M/s Akme Fintrade (India) Limited in due time.

As can be seen from the above statement, Shri Nirmal Kumar Jain submitted that he will provide relevant details in due time. However, no such details have been provided by him till the date. The assessee did not furnish details of valuation method applied. He did not explain about any major incident/policy change/ business scenario change etc. which triggered so much fluctuation in the prices of shares of the company. The data available in ITR do not suggest any such thing either. In these circumstances, the amount of premium received on issue of shares by the company appears to be highly suspicious. In this connection, you are requested to furnish the relevant documentary evidences as specified above in support of your claim. In case, you fail to furnish the same, necessary addition will be made in your hands after determination of **fair market value of shares on the basis of methods as prescribed in the Income-tax Act, 1961.**

4. Furnish/upload soft copy of relevant books of account as maintained. Also provide soft copy of day to day cash book (with narration).
5. You may submit your reply electronically through 'e-Proceedings' facility.

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR

(In case the document is digitally signed please refer Digital Signature at the bottom of the page)





GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT COMMISSIONER
OF INCOME TAX
CENTRAL CIRCLE 2,UDAIPUR

To,
AKME FINTRADE INDIA LIMITED
4-5,SUBCITY CENTRE , SAVINA
UDAIPUR 313001,Rajasthan
India

PAN: AABCA2962P	AY: 2018-19	Dated: 08/01/2024	DIN & Notice No : ITBA/AST/F/142(1)/2023-24/1059447036(1)
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आयकर अधिनियम, 1961 की धारा 142 की उप-धारा (1) के तहत सूचना
Notice under sub-section (1) of Section 142 of the Income Tax Act, 1961

महोदय/महोदया/मैसर्स
Sir/ Madam/ M/s,

निर्धारण वर्ष 2018-19 के लिए निर्धारण के संबंध में, आपको निम्न करने की आवश्यकता है:
In connection with the assessment for the assessment year 2018-19, you are required to:

- क) 12/01/2024 03:00 PM को या उससे पहले अनुलग्नक के अनुसार मांगे गए खातों और दस्तावेजों को प्रस्तुत करें, अथवा प्रस्तुत कराएं। या
- a) Produce, or cause to be produced, the accounts and documents called for as per annexure on or before 12/01/2024 03:00 PM or
- ख) अनुलग्नक के अनुसार और उसमें निर्दिष्ट बिंदुओं या मामलों पर मांगी गई जानकारी जो कि आयकर नियम, 1962 के नियम 14 के तहत निर्धारित तरीके से सत्यापित हो 12/01/2024 03:00 PM को या उससे पहले प्रस्तुत करें।
- b) Furnish the information called for as per annexure and on the points or matters specified therein and verified in the prescribed manner under Rule 14 of Income-tax Rules, 1962 on or before 12/01/2024 03:00 PM.
- ग) उपरोक्त साक्ष्य/सूचना आयकर विभाग की 'ई-फाइलिंग' वेबसाइट (www.incometax.gov.in) में आपके खाते के माध्यम से 'ई-प्रोसीडिंग्स' सुविधा में इलेक्ट्रॉनिक रूप से प्रस्तुत की जानी है। ई-फाइलिंग वेबसाइट (www.incometax.gov.in) पर 'ई-प्रोसीडिंग्स'/'पहचान विहीन निर्धारण' पर संक्षिप्त नोट उपलब्ध हैं।
- c) The above-mentioned evidence/information is to be furnished electronically in 'e-Proceedings' facility through your account in 'e-Filing' website of Income Tax Department (www.incometax.gov.in). Brief note

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* DIN- Document identification No.

on 'e-Proceedings'/'Faceless Assessment' are available on the e-Filing website (www.incometax.gov.in).

Yours faithfully,

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR



अनुलग्नक ANNEXURE

1. आयकर अधिनियम, 1961 की धारा 142(1) के तहत निम्नलिखित खाते या दस्तावेज या जानकारी मांगी गई है:
1. **The following accounts or documents or information is/are sought under section 142(1) of the Income-tax Act, 1961:**

In your case, you have filed original return of income for A.Y. 2018-19 on 27.10.2018 declaring total income of Rs. 154631190/-. The return of income was selected for scrutiny on various issues under Limited Scrutiny criteria. Assessment in your case was completed accepting returned income on 04.02.2021 u/s. 143(3) but certain omission had resulted in under computation of total income. Therefore, order u/s. 263 of the Income Tax was passed by the worthy Pr. CIT, Udaipur on 02.03.2023. In continuation to proceedings u/s. 143(3) r.w.s. 263, notice u/s. 142(1) was issued to you on 10.10.2023 to be complied on or before 17.10.2023. But till the date, you have not furnished the relevant details/information even otherwise you have not sought any adjournment. Since, your case is time barring in nature and you have been afforded ample and sufficient time to comply with the query letter issued to you and even after issuing notice u/s. 274 r.w.s. 272A(1)(d) you have not complied the same. However, before taking any adverse inference, and following the principle of natural justice, you are hereby being given **Last and Final Opportunity through this communication**. Please ensure compliance of this notice on or before the date mentioned in this notice and furnish the information/explanation on the following issues/points. Non-compliance of this last and final opportunity may attract imposition of penalty u/s. 272A(1)(d) of the Act and may compel the undersigned to pass order u/s. 144 of the Act, 1961 without any further communication in this regard to you.

1. Vide query letter dated 17.10.2023, the query was raised to you as under:

1. *It was noticed that you have made a provisions of Rs. 2274086/- in your books for NPA. While computing income under the head 'profit and gains of business or profession', you have added back the entire amount of Rs. 2274086/- debited in books for provision and claimed deduction of Rs. 8142602/- for provision for bad debt and doubtful debts u/s. 36(1)(vii)(d) of the Act, whereas it was to be restricted to Rs. 2274086/- only, as per CBDT's Instruction No. 17/2008 dated 26.11.2008. **The omission had resulted in under computation of business income of Rs. 5868516/- (8142602 - 2274086).***

2. *It was also noticed on perusal of Schedule-18, other expenses of the P&L Account that you have debited an expenditure as bad debts/written off amounting to Rs. 9058137/-. Further, as per Schedule-7 of the Balance sheet, liabilities side, there was a credit balance of Rs. 4366273/- in the 'Provision for bad and doubtful debts' at the beginning of the previous year. Hence, as per above provision, the bad debt/written off, first should have been debited to the account of provision for bad debt and doubtful debts upto Rs. 4366273/- and rest bad debts/written off amounting to Rs. 4691864/- (9058137-4366273) should have been debited in P&L Account, but the same was not done by you. **The omission had resulted in under computation of business income of Rs. 4691864/-.***

The above issues have not been considered and examined by the Assessing Officer which resulted into under assessment of Rs. 5868516/- and Rs. 4691864/- on account of above issues. Therefore, the Hon'ble PCIT, Udaipur had initiated proceedings u/s. 263 of the Act and after considering your submission and material placed on record, by passing order u/s. 263 dated 02.03.2023, the order passed u/s. 143(3) of the Act by the AO has been set aside.

You are therefore, requested to furnish your explanation on the above issues with relevant documentary evidences and also requested to show cause as to why the above additions should not be made in your hands.

3. It is relevant to mention here that search and seizure action u/s. 132 as well as survey 133A were conducted at Akme and Ankur Group on 23.11.2023. During search and survey proceedings as well as post search proceedings, it has been noticed that Akme Fintrade India Limited has issued shares to different shareholders in various financial years. In the post search proceedings, the details of shares issued were obtained which are tabulated below-

FY	Date	No. of Shares issued	Face Value	Premium
2016-17	09-06-2016	69230	10	100
2016-17	10-08-2016	117120	10	100
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2016-17	03-12-2016	103040	10	115
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2019-20	25-07-2019	580	10	790
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2020-21	30-01-2021	50000	10	190
2020-21	11-03-2021	72700	10	190
2020-21	31-03-2021	72700	10	190

As can be seen from the above table, the shares were issued at a huge premium consistently. It is also noticed that issue price of these shares ranges from as high as Rs. 800 to as low as Rs. 110. There is huge fluctuation in the issue price of shares in a very short span of time. It is seen that shares were issued at premium of Rs. 615/- per share on 03-03-2018 & premium of Rs. 790/- on 31-03-2018. This shows increase in per share price by Rs 175/- within a period of 28 days. Similarly, shares were issued at premium of Rs 790/- on 26-12-2019, which came down to Rs. 190/- per share on shares issued on 11-12-2020. This shows that per share price of the shares came down by Rs. 600/- within period of one year.

Accordingly, this issue was confronted to Shri Nirmla Kumar Jain, and he was required to furnish valuation method applied on different dates along with supporting evidence. He was also required to explain the reasons behind so much fluctuation in the share prices issued over a period of time. The relevant part of the statement is produced below:

Q194-Kindly submit the method of valuation of shares of M/s AkmeFintrade (India) Limited done under Rule 11UA.Also furnish the documents related to valuation of shares of M/s Akme Fintrade (India) Limited.

Ans : Under the Income Tax Rules, two methods are prescribed and option is given to the assessee. We opted for valuation as per valuation done by the CA or the merchant banker method, as the case may be and there is no difference. I will produce the valuation report of shares of M/s Akme Fintrade (India) Limited in due time.

*As can be seen from the above statement, Shri Nirmal Kumar Jain submitted that he will provide relevant details in due time. However, no such details have been provided by him till the date. The assessee did not furnish details of valuation method applied. He did not explain about any major incident/policy change/ business scenario change etc. which triggered so much fluctuation in the prices of shares of the company. The data available in ITR do not suggest any such thing either. In these circumstances, the amount of premium received on issue of shares by the company appears to be highly suspicious. In this connection, you are requested to furnish the relevant documentary evidences as specified above in support of your claim. In case, you fail to furnish the same, necessary addition will be made in your hands after determination of **fair market value of shares on the basis of methods as prescribed in the Income-tax Act, 1961.***

The above issue remained uncomplained with and unexplained on your part. Since, your case is time barring in nature and you have been afforded ample and sufficient time to comply with the above issue, therefore before taking any adverse inference, and following the principle of natural justice, you are hereby being given Last and Final Opportunity through this communication. Kindly ensure compliance of above query. Non-compliance of this **last and final opportunity** may compel the undersigned to pass order u/s. 144 of the Act, 1961 without any further communication in this regard to you **on the basis of information available on records, past history of your case and in the light of various observation/additions made in the assessment order for A.Y. 2018-19 in your case.**

2. Furnish/upload soft copy of relevant books of account as maintained. Also provide soft copy of day to day cash book (with narration).
3. You are requested to submit your reply electronically through 'e-Proceedings' facility.

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR

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This document is digitally signed

Signer: AJAY AGARWAL
Date: Monday, January 8, 2024 12:13 PM
Location: DIRECTORATE, India



GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT DIRECTOR OF
INCOME TAX, INVESTIGATION
DDIT/ADIT(Inv.),2,Udaipur

To,
AKME FINTRADE INDIA LIMITED
4-5,SUBCITY CENTRE,SAVINA, UDAIPUR,
Rajasthan India 313001

PAN:
AABCA2962P

Assessment Year:

DIN & Notice No : 396
ITBA/INV/S/131/2022-23/1048390500(1)

Dated:
02/01/2023

Sir/Madam

Sub: **SUMMONS TO ASSESSEE/ WITNESS UNDER SECTION 131(1A) OF THE INCOME TAX ACT, 1961.**

Whereas your attendance is required in connection with the proceedings under the Income Tax Act, 1961 in your case.

You are hereby required to attend my office at camp office--Room No.102B, First Floor, Income Tax office, Reti Stand, Savina, Udaipur, on 06/01/2023 at 01:10 PM, to give evidence and / or to produce either personally or through an authorized representative the books of account or other documents specified below and not to depart until you receive my permission to do so.

Without prejudice the provisions of any other law for the time being in force, if you intentionally omit to so attend and give evidence or produce the books of account or documents, a penalty of Rs. 10,000/- (Ten thousand only) may be imposed upon you under section 272A(1)(c) of the Income Tax Act, 1961 for each such default or failure.



Kalpesh Raghavbhai
02/01/23
KALPESH RAGHAVBHAI
KAVAD
DDIT/ADIT(Inv.),2,Udaipur

Books of Accounts or documents to be produced

Note: If digitally signed, the date of digital signature may be taken as date of document.
AAYKAR BHAWAN, UDAIPUR, RAJAST, SUBCITY CENTRE, SAVINA, UDAIPUR, Rajasthan, 313001
Email: UDAIPUR.DDIT.INV2@INCOMETAX.GOV.IN.

The website address of the e-filing portal has been changed from www.incometaxindiafiling.gov.in to www.incometax.gov.in.
Document identification No.

Handwritten notes at the bottom of the page, including "2000", "1000", and "made" written vertically.

1. Provide details of shareholders as on end of each financial year stating from 01.04.2012 in the case of Akme Fintrade India Limited.

S.N.	Full Name	PAN	Address	No. of Shares held

2. Provide details of shares issued by M/s Akme Fintrade India Limited from F.Y 2012-13 onwards till date, years wise in the following format, along with share's valuation certificate.

S.N.	Name	PAN	Address	No. of shares issued	face value	premium	date of issuance

3. Please also provide details of any buybacks of shares, Splitting of Shares, bonus Shares issued and shares transfers list by M/s Akme Fintrade India Limited stating from F.Y 2012-13 till date.



Kalpesh
02/01/23

KALPESH RAGHAVBHAI KAVAD
DDIT/ADIT(Inv.),2,Udaipur

001 / 2 / 2023



GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT DIRECTOR OF
INCOME TAX, INVESTIGATION
DDIT/ADIT(Inv.),2,Udaipur

To, AKME FINTRADE INDIA LIMITED 4-5,SUBCITY CENTRE,SAVINA, UDAIPUR, Rajasthan India 313001	
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PAN: AABCA2962P	Assessment Year:	DIN & Notice No : 413 ITBA/INV/S/131/2022-23/1048476532(1)	Dated: 05/01/2023
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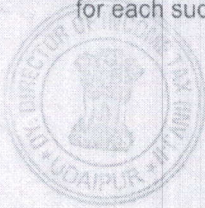
Sir/Madam

Sub: SUMMONS TO ASSESSEE/ WITNESS UNDER SECTION 131(1A) OF THE INCOME TAX ACT, 1961.

Whereas your attendance is required in connection with the proceedings under the Income Tax Act, 1961 in your case.

You are hereby required to attend my office **at camp office--Room No.102B, First Floor, Income Tax office, Reti Stand, Savina, Udiapur, on 09/01/2023 at 11:50 AM**, to give evidence and / or to produce either personally or through an authorized representative the books of account or other documents specified below and not to depart until you receive my permission to do so.

Without prejudice the provisions of any other law for the time being in force, if you intentionally omit to so attend and give evidence or produce the books of account or documents, a penalty of Rs. 10,000/- (Ten thousand only) may be imposed upon you under section 272A(1)(c) of the Income Tax Act,1961 for each such default or failure.



Kalpesh Raghavbhai
05/01/23
KALPESH RAGHAVBHAI
KAVAD
DDIT/ADIT(Inv.),2,Udaipur

Books of Accounts or documents to be produced

Please refer to summon dated 02.01.2023 vide with certain details were sought. In addition to that, please also furnish following details.

1. Provide Fixed Deposits ledger of M/s Akme Fintrade Inida Ltd.
2. Provide details of all Fixed Deposits (FD) accepted and repaid by the company in the following format.

S.No.	FD Holder's Name	FD Holder's PAN	FD Holder's Address	FD Amount	FD Taking Date	Whether FD has been repaid(Yes/No)	If FD is Repaid, the date on which repayment is made

3. Provide details of all bank accounts and details of all movable/immovable assets

Kalpesh
05/01/23

KALPESH RAGHAVBHAI KAVAD
DDIT/ADIT(Inv.),2,Udaipur

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GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT COMMISSIONER
OF INCOME TAX
CENTRAL CIRCLE 2,UDAIPUR

To,
MANJU DEVI JAIN
188, TEGORE NAGAR ,SEC NO. 4 HIRAN MAGRI
UDAIPUR 313001,Rajasthan
India

PAN: ADRPJ2998J	AY: 2019-20	Dated: 07/08/2023	DIN & Notice No : ITBA/AST/F/142(1)/2023-24/1054916186(1)
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आयकर अधिनियम, 1961 की धारा 142 की उप-धारा (1) के तहत सूचना
Notice under sub-section (1) of Section 142 of the Income Tax Act, 1961

महोदय/महोदया/मैसर्स
Sir/ Madam/ M/s,

निर्धारण वर्ष 2019-20 के लिए निर्धारण के संबंध में, आपको निम्न करने की आवश्यकता है:
In connection with the assessment for the assessment year 2019-20, you are required to:

- क) 16/08/2023 11:15 AM को या उससे पहले अनुलग्नक के अनुसार मांगे गए खातों और दस्तावेजों को प्रस्तुत करें, अथवा प्रस्तुत कराएं। या
- a) Produce, or cause to be produced, the accounts and documents called for as per annexure on or before 16/08/2023 11:15 AM or
- ख) अनुलग्नक के अनुसार और उसमें निर्दिष्ट बिंदुओं या मामलों पर मांगी गई जानकारी जो कि आयकर नियम, 1962 के नियम 14 के तहत निर्धारित तरीके से सत्यापित हो 16/08/2023 11:15 AM को या उससे पहले प्रस्तुत करें।
- b) Furnish the information called for as per annexure and on the points or matters specified therein and verified in the prescribed manner under Rule 14 of Income-tax Rules, 1962 on or before 16/08/2023 11:15 AM.
- ग) उपरोक्त साक्ष्य/सूचना आयकर विभाग की 'ई-फाइलिंग' वेबसाइट (www.incometax.gov.in) में आपके खाते के माध्यम से 'ई-प्रोसीडिंग्स' सुविधा में इलेक्ट्रॉनिक रूप से प्रस्तुत की जानी है। ई-फाइलिंग वेबसाइट (www.incometax.gov.in) पर 'ई-प्रोसीडिंग्स'/'पहचान विहीन निर्धारण' पर संक्षिप्त नोट उपलब्ध हैं।
- c) The above-mentioned evidence/information is to be furnished electronically in 'e-Proceedings' facility through your account in 'e-Filing' website of Income Tax Department (www.incometax.gov.in). Brief note

Note: If digitally signed, the date of digital signature may be taken as date of document.
,AAYKAR BHAWAN, UDAIPUR, RAJAST, SUBCITY CENTRE, SAVINA, UDAIPUR, Rajasthan, 313001
Email: UDAIPUR.DCIT.CEN2@INCOMETAX.GOV.IN,

Note:- The website address of the e-filing portal has been changed from www.incometaxindiaefiling.gov.in to www.incometax.gov.in.

* DIN- Document identification No.

on 'e-Proceedings'/'Faceless Assessment' are available on the e-Filing website (www.incometax.gov.in).

Yours faithfully,

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR



अनुलग्नक ANNEXURE

1. आयकर अधिनियम, 1961 की धारा 142(1) के तहत निम्नलिखित खाते या दस्तावेज या जानकारी मांगी गई है:
1. The following accounts or documents or information is/are sought under section 142(1) of the Income-tax Act, 1961:

This office has information that a search was initiated under section 132 of the Income Tax Act, 1961 in your case on the date 23/11/2022. Therefore, notice u/s. 148 of the I.T.Act, 1961 was issued on 29.03.2023 with prior approval of specified authority. It was proposed to assess or reassess such income or re-compute the loss or the depreciation allowance or any other allowance or deduction for the Assessment Year 2019-20 and you were, therefore, required to furnish, within 30 days from the service of this notice, a return in the prescribed form for the Assessment Year 2019-20. In response to said notice u/s. 148 of the Act, you have filed return of income u/s. 148 for A.Y. 2019-20 vide acknowledgement No. 128650370280423 on 28.04.2023 but the same has not been e-verified as yet and hence liable to be treated as invalid and as if no return is filed. There are certain issues, on which further clarification is required to complete assessment. You are therefore, requested to provide information/explain specific points as mentioned below with relevant documentary evidences:

1. Please provide brief note on the source of income and detail of business activities carried out during the year and method of accounting followed during the A.Y. 2019-20. In case of deviation in method of accounting, please mention and give a note on it.
2. Please provide complete set of following:-
 - a. Furnish complete return of income filed originally u/s. 139 of the Act alongwith computation of total income, income and expenditure account, Audit report, Balance Sheet, Profit & Loss A/c, Manufacturing/Trading a/c with schedules/annexures for the A.Y. 2019-20. In similar manner, please also file complete valid return of income filed u/s. 148, if any, with income and expenditure account, Audit report, Balance Sheet, Profit & Loss A/c, Manufacturing/Trading a/c with schedules/annexures for the A.Y. 2019-20.
 - b. Furnish salary certificate alongwith nature of duties performed by you in both concerns. In case of difference in addresses of both concerns, justify your salary income. Intimate your education qualification with proof.
 - c. Complete details of income from house property alongwith rental agreement (if any), name of tenant with PAN, property details etc. Sources of investment in the property be explained with evidences. Furnish copy of loan statement, if any, with sources of repayment.
 - d. Proof of income from other sources, if any. Also explain the sources of investment for deriving such income with evidences and complete details.
 - e. Complete details of agriculture income declared such as land details, khasra girdawari, crop details, expenses details, sale bills of mandi etc.
 - f. Proof of deduction claimed under chapter-VI. Also explain the source of investments thereof.
 - g. Quantum and nature of income, if any, claimed as exempt during the relevant previous year.
 - h. If you have held listed/unlisted shares for last three years, please furnish complete details thereof

alongwith sources of investment. If the shares were sold in these years, please state whether you have declared profit/gain in the year of sell or not? If yes, give proof. If not, please explain why necessary action as per the Act should not be taken in your hands? Please furnish copy of Demat Account for last years.

i. Provide the comparison of income reported, deductions/exemptions/rebate claimed, current year/carried forwarded loss set-off/adjusted, advance tax paid, self-assessment tax paid, TDS deducted, total tax paid, refund claimed for the current year under consideration and previous two years.

j. Please furnish latest/updated Form 26AS of the year under consideration. Please reconcile the gross receipts as per Form 26AS with your turnover/receipts shown as per your books of accounts/return of income, if any.

k. Whether you have revised the ITR for AY under consideration. If yes, please provide the details of changes made by you in the revised return in comparison to the original ITR filed for the year under consideration.

l. Please furnish details of exempt income with evidences of claim of exempt income, if any. Whether any expenses have been claimed in respect of any exempt income. If yes then submit the complete details of same.

m. Please also state your indulgence in any other business or please state are you also a director/partner in any other company/firm? If yes, please give complete details thereof alongwith income earned therefrom. Furnish copy of your account in the said firm/company.

n. Whether you have declared any undisclosed income or offered any income. If yes, furnish its complete detail alongwith detail of its generation and accumulation. Please also explain as to why penalty as per the Income-tax Act should not be initiated for disclosure of undisclosed income in the return.

o. Please state whether you have made payment in violation to provision of section 40A(3), 40(a)(ia), 43B, 69C, 269SS, 269T and 269ST etc. If yes, please show cause as to why necessary action as per the Income tax Act should not be taken.

p. Complete details of interest paid and received alongwith its rate.

q. Furnish head-wise TDS ledger with return of TDS (if any).

r. Furnish return of GST (if any).

3. Provide details of all bank accounts held (including the accounts closed during the year). Also furnish complete account statement with explanation regarding credit and debit entries appearing therein:

Name of the bank and branch	Account Number	Type of Account (SB/CA/OD/FD/others)	Interest accrued or received for the A.Y. 2019-20	Held in the name of / belongs to

It is relevant to mention here that during the course of search proceedings, following bank accounts were noticed as maintained by you:

S.no	Name of the A/c holder	A/c Number	Name of the Bank	Branch Address
1	Manju Devi Jain	668062610000082	Bank of India	3,karjali bhavan, nyay marg, Udaipur, Rajasthan-313001
		1370100026666	BANK OF BARODA	Udaipur main branch, opp. town hall, udaipur, Rajasthan, Udaipur,313001
		50104000159203	IDBI BANK LTD	16,Mumal towers saheli marg , Udaipur

Please furnish complete account statements for the period under consideration explaining credit and debit entries appearing in the said statement.

4. List of sundry creditors with name, address, PAN, credit balance, if applicable.
5. Furnish details of unsecured loans/deposits taken during the year including squared up loan.
6. Give details of the loans, advances and deposits given, including the accounts squared up during the year.
7. Whether you have made any expenditure on any social ceremony like marriage, birthday, religious trip etc. during the year under consideration, if so, give complete details thereof.
8. Regarding all the fixed assets added during the year, submit the following information:-

S.N.	Name, full address of supplier	Bill No. and date	Bill amount + Sales Tax/GST & Excise charged on bill	Date and mode of payment cash / bank a/c cheque No. a/c no. and bank branch	Any other cost such as transportation, interest etc. added into the actual cost.

9. Please furnish complete details of addition/deletion of movable and immovable property during the year with all relevant documentary evidence. Sources of investment be explained with evidences. Please explain the sources of investment/purchase of properties with relevant evidences. Please also furnish copy of registry for verification. Please also give complete details regarding construction activities done on the above properties with sources of construction expenses.

10. Complete details of household expenses alongwith contribution made by family members.

11. During search proceedings, it is gathered that you are having following immovable properties:

SR. NO.	PLOT NO.	AREA(SQ.FIT)	PLACE	ARAJAI NO.	DATE	REGISTRY/PATTA
1	10	1245	MANVA KHEDA	1600-1602	8/20/2008	REGISTRY
2	AGRICULTURE	1 batta 28		4074/4230/294	11/19/2001	REGISTRY
3	3BATAA 40	450 SQ FIT	HOUSEING BOARD GOVERDHAN VILASH		2003/04	
4	21/B	1067.52	SEC.4		2009	
5	AGRICULTURE	1.25	TITRDI		2003	
6	AGRICULTURE	1.5 BIGA	BHANSOL MAVLI		08.05.2019	
7	AGRICULTURE	6BIGA	BHUPAT KEDI BOYNA MAVLI		11.9.2018	

Please explain the sources of investment/purchase of above properties with relevant evidences. Please also furnish copy of registry for verification. Please also give complete details regarding construction activities done on the above properties with sources of construction expenses. If there is any difference in value determined by the Sub-Registrar and sale/purchase consideration, necessary addition should not be made in your hands as per relevant provisions of I.T.Act, 1961.

12. You belong to Akme and Ankur Group, Udaipur, where search and survey operations were carried out simultaneously on 23.11.2022 including premises pertains to you. During the course of search, following incriminating documents were found and seized/impounded. These incriminating documents are also related to you and transactions appearing therein are done by you.

S.No.	Premises	Related to	Party No.	Annexure
1.	188, Tagor Nagar, Hiran Magri Sector-4, Udaipur	Nirmal Jain Dipesh Jain	Party No. A-1	Exh.1 to 7

		Jenisha Jain Nirmal Kumar Jain Manju Devi Jain Kartika Jain		
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Please give your explanation on each and every page of these annexure with supporting evidence (in the following format). Please get verified each and every page of these Annexures from the regular books of accounts maintained by you. Please also give details of entries/amounts (Annexure-wise) which are not verifiable from your regular books of accounts alongwith with the reasons as to why the amount involved in these entries/ annexures should not be considered as your undisclosed income.

Annexure	Page No.	Description	Page belongs to	Amount involved
1	2	3	4	5
Whether declared in return/entered in books of accounts	Supporting evidence	Remarks		
6	7	8		

You are also requested to please explain and prove your various contentions with supporting documentary evidence/books of accounts/returns of income filed by respective persons of family members. Please also get verified the sale/purchases vouchers and transaction appeared in various loose papers and notebooks found and seized from regular books of accounts. All photocopies of the said Annexures and statements are supposed to have been provided/given to you by the ADIT/DDIT(Inv.), Udaipur before filing of returns of income.

If the loose paper/documents/entry appeared therein belongs to any other person then please furnish the name and complete address of such person, the name of his Assessing Officer alongwith his confirmation in the form of affidavit. The person should also be produced for verification. Please also explain why such loose paper/documents etc. was lying in your custody. In this regard your attention is also invited to the provisions of section 292C of the I.T. Act, 1961 which deals with presumption as to assets, books of accounts, money, bullion, jewellery etc. found in the possession or control of any person in the course of a search u/s.132 of the Act, it shall be presumed that the assets, books of accounts, money, bullion, jewellery belongs to such person, if he fails to prove it otherwise. You are therefore; requested to please give your explanation alongwith supporting evidence. In case, you fail to explain the same, please show cause as to why the amount involved should not be treated as unexplained and added in your hands.

13. In respect of land/property transaction appearing in the above annexure as well as pointed out in your statement recorded during the course of search/post search proceedings, please furnish the

information in following format:

i. Please furnish the detailed chart in respect of each and every property as mentioned in entire seized material such as:

S.No. / description of property / from whom it was purchased / amount of purchase consideration / registry value / to whom it was sold / amount of sale consideration / registry value / DLC rate of property / remarks.

ii. Please explain as to how these properties have been acquired by you in your name or in your family member's name. Furnish supporting evidences.

iii. Please explain the source of investment in these properties supported by documentary evidence failing which unexplained investment in these assets will be brought to tax in your hand in the relevant assessment year as income from undisclosed sources.

iv. Please give the mode of payment of consideration amount and details of other relating expenses in respect of above mentioned properties be furnished.

v. Please also intimate after purchasing the immovable properties whether new construction/renovation/addition/alteration in existing building/land has been done, if so, please submit complete details thereof, such nature of addition/alteration/renovation/period/amount of investment made and explain the source of investment.

vi. Please intimate the rental income derived from the properties on their letting out and period from when these are let out and to whom these are let out.

vii. Please also intimate whether the rental incomes of properties are being shown in return of income filed by you, if so, please produce necessary evidence in this regard.

viii. Please produce Khasra of agricultural land and give the name of the person who is carrying out farming on your agricultural land. Produce evidence regarding agreement with the farmer, if any, as well as produce evidence regarding agricultural income.

ix. If any of the above named properties have been resold after purchase, please intimate the same and give full particulars alongwith necessary documentary evidences.

x. As per available details, the above mentioned properties have been purchased at lower value than the rate stipulated for the area. Please state and explain why it should not be treated as deemed investment.

xi. If the property belongs to any other person/your family members, please furnish name and address of the person alongwith his confirmation in the form of affidavit. The person should also be produced for verification. Please also explain why the property belonging to the other person is lying in your possession.

xii. If there is any difference in value determined by the Sub-Registrar and sale/purchase consideration, why necessary addition should not be made in your hands as per relevant provisions of I.T.Act, 1961.

14. Furnish/upload soft copy of relevant books of account as maintained. Also provide soft copy of day to day cash book (with narration).

15. You may submit your reply electronically through 'e-Proceedings' facility.

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR

(In case the document is digitally signed please refer Digital Signature at the bottom of the page)



This document is digitally signed

Signer: AJAY AGARWAL
Date: Monday, August 14, 2023 4:36 PM
Location: DIRECTORATE, India



GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT COMMISSIONER
OF INCOME TAX
CENTRAL CIRCLE 2,UDAIPUR

To,
MANJU DEVI JAIN
188, TEGORE NAGAR ,SEC NO. 4 HIRAN MAGRI
UDAIPUR 313001,Rajasthan
India

PAN: ADRPJ2998J	AY: 2019-20	Dated: 08/01/2024	DIN & Notice No : ITBA/AST/F/142(1)/2023-24/1059468043(1)
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आयकर अधिनियम, 1961 की धारा 142 की उप-धारा (1) के तहत सूचना
Notice under sub-section (1) of Section 142 of the Income Tax Act, 1961

महोदय/महोदया/मैसर्स
Sir/ Madam/ M/s,

निर्धारण वर्ष 2019-20 के लिए निर्धारण के संबंध में, आपको निम्न करने की आवश्यकता है:
In connection with the assessment for the assessment year 2019-20, you are required to:

- क) 12/01/2024 03:41 PM को या उससे पहले अनुलग्नक के अनुसार मांगे गए खातों और दस्तावेजों को प्रस्तुत करें, अथवा प्रस्तुत कराएं। या
- a) Produce, or cause to be produced, the accounts and documents called for as per annexure on or before 12/01/2024 03:41 PM or
- ख) अनुलग्नक के अनुसार और उसमें निर्दिष्ट बिंदुओं या मामलों पर मांगी गई जानकारी जो कि आयकर नियम, 1962 के नियम 14 के तहत निर्धारित तरीके से सत्यापित हो 12/01/2024 03:41 PM को या उससे पहले प्रस्तुत करें।
- b) Furnish the information called for as per annexure and on the points or matters specified therein and verified in the prescribed manner under Rule 14 of Income-tax Rules, 1962 on or before 12/01/2024 03:41 PM.
- ग) उपरोक्त साक्ष्य/सूचना आयकर विभाग की 'ई-फाइलिंग' वेबसाइट (www.incometax.gov.in) में आपके खाते के माध्यम से 'ई-प्रोसीडिंग्स' सुविधा में इलेक्ट्रॉनिक रूप से प्रस्तुत की जानी है। ई-फाइलिंग वेबसाइट (www.incometax.gov.in) पर 'ई-प्रोसीडिंग्स'/'पहचान विहीन निर्धारण' पर संक्षिप्त नोट उपलब्ध हैं।
- c) The above-mentioned evidence/information is to be furnished electronically in 'e-Proceedings' facility through your account in 'e-Filing' website of Income Tax Department (www.incometax.gov.in). Brief note

Note: If digitally signed, the date of digital signature may be taken as date of document.
,AAYKAR BHAWAN, UDAIPUR, RAJAST, SUBCITY CENTRE, SAVINA, UDAIPUR, Rajasthan, 313001
Email: UDAIPUR.DCIT.CEN2@INCOMETAX.GOV.IN,

Note:- The website address of the e-filing portal has been changed from www.incometaxindiaefiling.gov.in to www.incometax.gov.in.

* DIN- Document identification No.

on 'e-Proceedings'/'Faceless Assessment' are available on the e-Filing website (www.incometax.gov.in).

Yours faithfully,

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR



अनुलग्नक ANNEXURE

1. आयकर अधिनियम, 1961 की धारा 142(1) के तहत निम्नलिखित खाते या दस्तावेज या जानकारी मांगी गई है:
1. **The following accounts or documents or information is/are sought under section 142(1) of the Income-tax Act, 1961:**

This office has information that a search was initiated under section 132 of the Income Tax Act, 1961 in your case on the date 23/11/2022. Therefore, notice u/s. 148 of the I.T.Act, 1961 was issued on 29.03.2023 with prior approval of specified authority. It was proposed to assess or reassess such income or re-compute the loss or the depreciation allowance or any other allowance or deduction for the Assessment Year 2019-20 and you were, therefore, required to furnish, within 30 days from the service of this notice, a return in the prescribed form for the Assessment Year 2019-20. In response to said notice u/s. 148 of the Act, you have filed return of income u/s. 148 for A.Y. 2019-20 vide acknowledgement No. 128650370280423 on 28.04.2023 but the same has not been e-verified as yet and hence liable to be treated as invalid and as if no return is filed. There are certain issues, on which further clarification was required. Therefore, notice u/s. 142(1) was issued to you on 28.07.2023. In response to which, you have filed written submission which has been considered carefully and it is found to be part submission. You have not replied with all the queries as raised vide notice dated 28.07.2023. You are therefore, once again requested to provide information/explain specific points as mentioned below with relevant documentary evidences:

1. Furnish income & expenditure account for the year under consideration.
2. Please furnish copy of registry of property from which income from house property declared. Also furnish rental agreement.
3. Please explain the debit/credit entries appearing in the relevant bank account statement. Please also furnish copy of detailed account in respect of person having transaction of debit/credit exceeding Rs. 1 Lac.
4. During the year under consideration, you have shown dividend of Rs. 115673/-. The relevant details of investment in share and copy of demat account were called for but the same has not been furnished except copy of demat account. You are required to furnish ledger account in respect of share transaction. Please submit detailed ledger account in respect of share transaction. Please also furnish your account in the books of your broker from the date of 01.04.2014 to 31.03.2023. It is undisputed fact that you are belonging to Akme & Ankur Group where search and seizure action was conducted including you. You have also been indulged in sale and purchase of shares of group company of Akme & Ankur Group. Please furnish complete details of sale and purchase of shares of all companies related to Akme Group as appearing your demat account. Please furnish your account in the books of these companies for A.Y. 2014-15 to 2023-24. Please also furnish relevant bank account statement indicating relevant entries therein.
5. In respect of agriculture income, please furnish copy of land documents, details of crops cultivated, expenses incurred on seeds, fertilizers, mandi bills, khasra girdawari etc. for verification. In absence of evidences, your claim of exemption will be rejected and said income will be taxed accordingly.
6. **Please furnish the explanation on remaining queries which are reproduced as under:**

4. List of sundry creditors with name, address, PAN, credit balance, if applicable.
5. Furnish details of unsecured loans/deposits taken during the year including squared up loan.
6. Give details of the loans, advances and deposits given, including the accounts squared up during the year.
7. Whether you have made any expenditure on any social ceremony like marriage, birthday, religious trip etc. during the year under consideration, if so, give complete details thereof.
8. Regarding all the fixed assets added during the year, submit the following information:-

S.N.	Name, full address of supplier	Bill No. and date	Bill amount + Sales Tax/GST & Excise charged on bill	Date and mode of payment cash / bank a/c cheque No. a/c no. and bank branch	Any other cost such as transportation, interest etc. added into the actual cost.

9. Please furnish complete details of addition/deletion of movable and immovable property during the year with all relevant documentary evidence. Sources of investment be explained with evidences. Please explain the sources of investment/purchase of properties with relevant evidences. Please also furnish copy of registry for verification. Please also give complete details regarding construction activities done on the above properties with sources of construction expenses.
10. Complete details of household expenses alongwith contribution made by family members.
11. During search proceedings, it is gathered that you are having following immovable properties:

SR. NO.	PLOT NO.	AREA(SQ.FIT)	PLACE	ARAJAI NO.	DATE	REGISTRY/PATTA
1	10	1245	MANVA KHEDA	1600-1602	8/20/2008	REGISTRY
2	AGRICULTURE	1 batta 28		4074/4230/294	11/19/2001	REGISTRY
3	3BATAA 40	450 SQ FIT	HOUSEING BOARD GOVERDHAN VILASH		2003/04	
4	21/B	1067.512	SEC.4		2009	

SR. NO.	PLOT NO.	AREA(SQ.FIT)	PLACE	ARAJAI NO.	DATE	REGISTRY/PATTA
5	AGRICULTURE	1.25	TITRDI		2003	
6	AGRICULTURE	1.5 BIGA	BHANSOL MAVLI		08.05.2019	
7	AGRICULTURE	6BIGA	BHUPAT KEDI BOYNA MAVLI		11.9.2018	

Please explain the sources of investment/purchase of above properties with relevant evidences. Please also furnish copy of registry for verification. Please also give complete details regarding construction activities done on the above properties with sources of construction expenses. If there is any difference in value determined by the Sub-Registrar and sale/purchase consideration, necessary addition should not be made in your hands as per relevant provisions of I.T.Act, 1961.

12. You belong to Akme and Ankur Group, Udaipur, where search and survey operations were carried out simultaneously on 23.11.2022 including premises pertains to you. During the course of search, following incriminating documents were found and seized/impounded. These incriminating documents are also related to you and transactions appearing therein are done by you.

S.No.	Premises	Related to	Party No.	Annexure
1.	188, Tagor Nagar, Hiran Magri Sector-4, Udaipur	Nirmal Jain Dipesh Jain Jenisha Jain Nirmal Kumar Jain Manju Devi Jain Kartika Jain	Party No. A-1	Exh.1 to 7

Please give your explanation on each and every page of these annexure with supporting evidence (in the following format). Please get verified each and every page of these Annexures from the regular books of accounts maintained by you. Please also give details of entries/amounts (Annexure-wise) which are not verifiable from your regular books of accounts alongwith with the reasons as to why the amount involved in these entries/ annexures should not be considered as your undisclosed income.

Annexure	Page No.	Description	Page belongs to	Amount involved
----------	----------	-------------	-----------------	-----------------

1	2	3	4	5
Whether declared in return/entered in books of accounts	Supporting evidence	Remarks		
6	7	8		

You are also requested to please explain and prove your various contentions with supporting documentary evidence/books of accounts/returns of income filed by respective persons of family members. Please also get verified the sale/purchases vouchers and transaction appeared in various loose papers and notebooks found and seized from regular books of accounts. All photocopies of the said Annexures and statements are supposed to have been provided/given to you by the ADIT/DDIT(Inv.), Udaipur before filing of returns of income.

If the loose paper/documents/entry appeared therein belongs to any other person then please furnish the name and complete address of such person, the name of his Assessing Officer alongwith his confirmation in the form of affidavit. The person should also be produced for verification. Please also explain why such loose paper/documents etc. was lying in your custody. In this regard your attention is also invited to the provisions of section 292C of the I.T. Act, 1961 which deals with presumption as to assets, books of accounts, money, bullion, jewellery etc. found in the possession or control of any person in the course of a search u/s.132 of the Act, it shall be presumed that the assets, books of accounts, money, bullion, jewellery belongs to such person, if he fails to prove it otherwise. You are therefore; requested to please give your explanation alongwith supporting evidence. In case, you fail to explain the same, please show cause as to why the amount involved should not be treated as unexplained and added in your hands.

13. In respect of land/property transaction appearing in the above **annexure** as well as **pointed out in your statement recorded during the course of search/post search proceedings**, please furnish the information in following format:

i. Please furnish the detailed chart in respect of each and every property as mentioned in entire seized material such as:

S.No. / description of property / from whom it was purchased / amount of purchase consideration / registry value / to whom it was sold / amount of sale consideration / registry value / DLC rate of property / remarks.

ii. Please explain as to how these properties have been acquired by you in your name or in your family member's name. Furnish supporting evidences.

iii. Please explain the source of investment in these properties supported by documentary evidence failing which unexplained investment in these assets will be brought to tax in your hand in the relevant assessment year as income from undisclosed sources.

iv. Please give the mode of payment of consideration amount and details of other relating expenses in respect of above mentioned properties be furnished.

v. Please also intimate after purchasing the immovable properties whether new

construction/renovation/addition/alteration in existing building/land has been done, if so, please submit complete details thereof, such nature of addition/alteration/renovation/period/amount of investment made and explain the source of investment.

vi. Please intimate the rental income derived from the properties on their letting out and period from when these are let out and to whom these are let out.

vii. Please also intimate whether the rental incomes of properties are being shown in return of income filed by you, if so, please produce necessary evidence in this regard.

viii. Please produce Khasra of agricultural land and give the name of the person who is carrying out farming on your agricultural land. Produce evidence regarding agreement with the farmer, if any, as well as produce evidence regarding agricultural income.

ix. If any of the above named properties have been resold after purchase, please intimate the same and give full particulars alongwith necessary documentary evidences.

x. As per available details, the above mentioned properties have been purchased at lower value than the rate stipulated for the area. Please state and explain why it should not be treated as deemed investment.

xi. If the property belongs to any other person/your family members, please furnish name and address of the person alongwith his confirmation in the form of affidavit. The person should also be produced for verification. Please also explain why the property belonging to the other person is lying in your possession.

xii. If there is any difference in value determined by the Sub-Registrar and sale/purchase consideration, why necessary addition should not be made in your hands as per relevant provisions of I.T.Act, 1961.

14. Furnish/upload soft copy of relevant books of account as maintained. Also provide soft copy of day to day cash book (with narration).

15. You may submit your reply electronically through 'e-Proceedings' facility.

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR

(In case the document is digitally signed please refer Digital Signature at the bottom of the page)

This document is digitally signed

Signer: AJAY AGARWAL
Date: Monday, January 8, 2024 4:00 PM
Location: DIRECTORATE, India



GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT COMMISSIONER
OF INCOME TAX
CENTRAL CIRCLE 2,UDAIPUR

To,
MANJU DEVI JAIN
188, TEGORE NAGAR ,SEC NO. 4 HIRAN MAGRI
UDAIPUR 313001,Rajasthan
India

PAN: ADRPJ2998J	AY: 2019-20	Dated: 03/03/2024	DIN & Notice No : ITBA/AST/F/142(1)/2023-24/1061911243(1)
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आयकर अधिनियम, 1961 की धारा 142 की उप-धारा (1) के तहत सूचना
Notice under sub-section (1) of Section 142 of the Income Tax Act, 1961

महोदय/महोदया/मैसर्स
Sir/ Madam/ M/s,

निर्धारण वर्ष 2019-20 के लिए निर्धारण के संबंध में, आपको निम्न करने की आवश्यकता है:
In connection with the assessment for the assessment year 2019-20, you are required to:

- क) 07/03/2024 11:39 AM को या उससे पहले अनुलग्नक के अनुसार मांगे गए खातों और दस्तावेजों को प्रस्तुत करें, अथवा प्रस्तुत कराएं। या
- a) Produce, or cause to be produced, the accounts and documents called for as per annexure on or before 07/03/2024 11:39 AM or
- ख) अनुलग्नक के अनुसार और उसमें निर्दिष्ट बिंदुओं या मामलों पर मांगी गई जानकारी जो कि आयकर नियम, 1962 के नियम 14 के तहत निर्धारित तरीके से सत्यापित हो 07/03/2024 11:39 AM को या उससे पहले प्रस्तुत करें।
- b) Furnish the information called for as per annexure and on the points or matters specified therein and verified in the prescribed manner under Rule 14 of Income-tax Rules, 1962 on or before 07/03/2024 11:39 AM.
- ग) उपरोक्त साक्ष्य/सूचना आयकर विभाग की 'ई-फाइलिंग' वेबसाइट (www.incometax.gov.in) में आपके खाते के माध्यम से 'ई-प्रोसीडिंग्स' सुविधा में इलेक्ट्रॉनिक रूप से प्रस्तुत की जानी है। ई-फाइलिंग वेबसाइट (www.incometax.gov.in) पर 'ई-प्रोसीडिंग्स'/'पहचान विहीन निर्धारण' पर संक्षिप्त नोट उपलब्ध हैं।
- c) The above-mentioned evidence/information is to be furnished electronically in 'e-Proceedings' facility through your account in 'e-Filing' website of Income Tax Department (www.incometax.gov.in). Brief note

Note: If digitally signed, the date of digital signature may be taken as date of document.
,AAYKAR BHAWAN, UDAIPUR, RAJAST, SUBCITY CENTRE, SAVINA, UDAIPUR, Rajasthan, 313001
Email: UDAIPUR.DCIT.CEN2@INCOMETAX.GOV.IN,

Note:- The website address of the e-filing portal has been changed from www.incometaxindiaefiling.gov.in to www.incometax.gov.in.

* DIN- Document identification No.

on 'e-Proceedings'/'Faceless Assessment' are available on the e-Filing website (www.incometax.gov.in).

Yours faithfully,

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR



अनुलग्नक ANNEXURE

1. आयकर अधिनियम, 1961 की धारा 142(1) के तहत निम्नलिखित खाते या दस्तावेज या जानकारी मांगी गई है:
1. The following accounts or documents or information is/are sought under section 142(1) of the Income-tax Act, 1961:

In continuation to assessment proceedings in your case, there are certain issues, on which further clarification is required. You are therefore, once again requested to provide information/explain specific points as mentioned below with relevant documentary evidences:

1. During the course of search proceedings at following premises of Akme & Ankur Group, your group, the following documents/pages were found and seized related to you. Please give your explanation on the transactions appearing in the seized/impounded pages with relevant documentary evidences. Please also intimate whether the relevant transactions have duly been considered while filing return of income for relevant A.Y. If not, please show cause as to why the same should not be considered as your income for the relevant year. Please note that if such transactions are not related to the years under assessments, then please furnish the relevant documents which shows that these transactions have duly been considered in that year's return of income filed, if any.

Page No.	Annexure	Premises belongs to	Description
31 front and back side	01	Party No. A-1, Nirmal Jain, 188, Tagore Nagar, Hiran Magri Sector-4, Udaipur	This page contains details of the date-wise amount which was transferred by 'Anil Kumar Jain HUF', ' Manju Devi Jain' & 'Kanta Jain' through the different companies or firms.
33	01		This page contains details of transaction related to Manju Devi Jain in which 'quantity sold', 'sale price', 'decided price', 'diff. amt receivable' etc are calculated and mentioned.
105	01		This page contains noting related to various plots wherein cash amount is also mentioned. The same is summarized as under: Plot No. Name Cash Amount 12 Manju Devi Jain 29,94,000 13 Neelam Jain 29,00,000 14 R. K. Jain 32,85,000
26	5		This page contains noting regarding renting of Flat No. 10 by Sonal Austin. As per the statement of Shri Nirmal Kumar Jain, noting on this

			page are related to a flat rented out by his wife, Smt. Manju Devi Jain and her rental income is shown in the ITR.						
69	6	Party No. A-4, Kamal Jain 529, Hiran Magri, Sector-4, Udaipur	This page contains handwritten details of the Dabok land, As per this total land in the name of Akme Build Estate Pvt Ltd, Nilam Jain, Manju Devi Jain and Ramesh Kumar Jain and Kamlesh Kumar Jain and total of this land as stock of Rs. 6,22,88,000/-.						
5	169- 186, 207-210	Party No. A-26, Akme Business Centre, 4-5 Subcity Centre, Opp. Krishi Upaj Mandi, Udaipur	These pages contain copy of cheques issued with respect to sale deeds discussed in this exhibit as under:						
			Page	Date	Bank	Issued in favour of	Issued by	Amount	Purpose
			169	21-10-2021	ICICI	Ramesh Kumar Jain	Nathu Lal Sahu	450000	Plot no. 17, Akmeshwar Vihar
			170	25-10-2021	HDFC	Manju Jain	Vipin Seth	277500	Wadi Plot no. 32
			171	13-10-2021	ICICI	Ashish Jain	Dharam Das Rangwani	51000	Wadi Plot no. 27
			172	28-11-2021	ICICI	Ashish Jain	Dharam Das Rangwani	399000	Plot no. 7
			172	28-11-2021	ICICI	Kavish Jain	Sushma Rangwani	440000	Plot no. 8
			173	28-11-2021	HDFC	Anil Kumar Jain	Dakshesh Chunilal Joshi	500000	Plot no. 2

			173	17-11-2021	Axis	Anil Kumar Jain	Sharma Kaushalendra Kumar	376000	Plot no. 14
			174	18-11-2021	ICICI	Ashish Kumar Jian	Mahesh Puri Goswami	451500	Plot no. 8
			175	30-11-2021	BOI	Blank	Chirag Ahuja Basant Ahuja	150000	Plot no. 9
			175	08-11-2021	BOI	Blank	Chirag Ahuja Basant Ahuja	200000	Plot no. 9
			176	08-10-2021	ICICI	Manju Devi Jain	Chetan Prakash	490000	Plot no. 21
			176	08-10-2021	ICICI	Plot no. 21	Manju Kunwar Shaktawat	200000	Plot no. 23
			177	20-10-2021	SBI	Akhilesh Jain	Bhagwati Lal Suthar	438000	Plot no. 7, Akmeshwar Vihar
			177 & 178	24-10-2021	SBI	Ramesh Kumar Jain	Upendra Rav	425000	Plot no. 6, Akmeshwar Vihar
			179	30-09-2021	Axis	Manju Devi Jain	Aadhar Housing Finance Limited	300000	Plot no. 23, Akmeshwar Vihar
			180	25-10-	HDFC	Manju Devi Jain	Vipin Seth	277500	Plot no. 32

				2021						
				181	09-11-2021	SBI	Anil Kumar Jain	Yashwant Choudhary	390000	Plot no. 3 wadi
				182	08-11-2021	BOI	Pushpa Nagda	Chirag Ahuja Basant Ahuja	200000	Plot no. 9
				182	30-11-2021	BOI	Pushpa Nagda	Chirag Ahuja Basant Ahuja	150000	Plot no. 9
				183	-	CBI	Anil Kumar Jain	Deepak Padiyar	520000	Plot no.13, Akmeshwar Vihar
				184	16-11-2021	SBI	Abhilasha Jain	Sanjay Padiyar	440000	Plot no.29, Akmeshwar Vihar
				185	30-10-2021	Kotak	Ramesh Kumar Jain	-	230000	Plot no. 15 wadi
				186	17-11-2021	Axis	Anil Kumar Jain	Sharma Kaushalendra Kumar	376000	Plot no. 14 wadi
				187	25-11-2021	Kotak	Ramesh Kumar Jain	-	300000	Plot no. 15 wadi
				207	-	BOB	Manju Jain	Prakash Purbia	475000	Plot no. 20
				207	-	CBI	Anil Kumar Jain	Deepak Padiyar	200000	

			207	25-11-2021	Adarsh	Manju Jain	Manisha and Ajay Mata	350000	Plot no. 22
			208	04-12-2021	SBI	Anil Kumar Jain	Rahul Singh Chouhan	575000	Plot no. 12
			208	06-12-2021	SBI	Anil Kumar Jain	Yashwant Choudhary	350000	Plot no. 11
			209	14-12-2021	HDFC	Ramesh Kumar Jain	Dakshesh Chunnilal Joshi	450000	Plot no. 16 wadi
			210	13-12-2021	BOB	Anil Kumar Jain	Hardik Purbiya	625000	Plot no. 1 wadi

2. You are requested to submit your reply electronically through 'e-Proceedings' facility.

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR

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GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE INCOME TAX
OFFICER
ITO WD-2(1), UDP

To, MANJU DEVI JAIN 188, TEGORE NAGAR , SEC NO. 4 HIRAN MAGRI UDAIPUR 313001 , Rajasthan India	
--	--

PAN: ADRPJ2998J	A.Y: 2019-20	Dated: 29/03/2023	DIN & Notice No: ITBA/AST/S/148_1/2022- 23/1051615488(1)
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Notice under section 148 of the Income-tax Act,1961

Sir/Madam/ M/s.

- I have information that a search was initiated under section 132 of the Act in your case or in the case of the person in respect of which you are the assessable under the Act on the date 23/11/2022.
This notice is being issued after obtaining the prior approval of the **PCIT, Udaipur** accorded on date vide Reference No. **10000038520803**.
- I, therefore, propose to assess or reassess such income or recompute the loss or the depreciation allowance or any other allowance or deduction for the Assessment Year **2019-20** and I, hereby, require you to furnish, within 30 days from the service of this notice, a return in the prescribed form for the Assessment Year **2019-20**.

THUNDATHIL PADMANABHAN SAJEEV
ITO WD-2(1), UDP

(In case the document is digitally signed please refer Digital Signature at the bottom of the page)

Note: If digitally signed, the date of digital signature may be taken as date of document.

,AAYKAR BHAWAN, UDAIPUR, RAJAST, SUBCITY CENTRE, SAVINA, UDAIPUR, Rajasthan, 313001

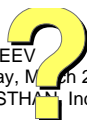
Email: UDAIPUR.ITO2.1@INCOMETAX.GOV.IN,

This document is digitally signed

Note:- The website address of the e-filing portal has been changed from www.incometaxindiaefiling.gov.in to www.incometax.gov.in.

* DIN-Documents identification No.

Signer: T P SAJEEV
Date: Wednesday, March 29, 2023 9:29 PM
Location: RAJASTHAN, India



Notice under section 143(2) of the Income-tax Act, 1961



GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT
COMMISSIONER OF INCOME
TAX
CENTRAL CIRCLE 2,UDAIPUR

PAN: ADRPJ2998J

DIN: ITBA/AST/S/143(2)/2023-24/1053898746(1)

Name: MANJU DEVI JAIN

Date: 23/06/2023

Address: 188, TEGORE NAGAR , SEC NO. 4 HIRAN
MAGRI
UDAIPUR 313001 , Rajasthan, India

Assessment Year: 2022-23

Financial Year: 2021-22

क. आपको यह संचार क्यों मिल रहा है?

A. Why are you getting this communication?

प्रिय करदाता,

Dear Taxpayer,

आयकर विभाग आपके द्वारा निर्धारण वर्ष 2022-23 के लिए दिनांक 31/12/2022 को पावती संख्या 905291410311222 के तहत आयकर विवरणी दाखिल करने पर, देश के विकास में आपके योगदान की सराहना करता है।

The Income Tax Department appreciates your contribution towards development of the Nation by filing of your return of income for the Assessment Year 2022-23 vide Ack. no. 905291410311222 on 31/12/2022.

विवरणिका को तैयार करने में आपकी सावधानी को स्वीकार करते हुए, कुछ मुद्दों पर और स्पष्टीकरण की आवश्यकता है, जिनके कारण आपकी आय विवरणिका को आयकर अधिनियम, 1961 के प्रावधानों के अनुसार संवीक्षा मूल्यांकन के लिए चुना गया है।

While acknowledging the care you may have taken in preparing the return of income, there are certain issues, on which further clarification is required. Therefore, the return of income has been selected for scrutiny assessment in accordance with the provisions of the Income-tax Act, 1961.

ख. आपको क्या करने की आवश्यकता है?

B. What you need to do?

आप ई-फाइलिंग वेबसाइट (www.incometax.gov.in) में इलेक्ट्रॉनिक रूप से अपने खाते के माध्यम से 'ई-प्रोसीडिंग्स' की सुविधा का उपयोग करके, अपनी सुविधानुसार कोई भी साक्ष्य, जिस पर आप अपनी आयकर विवरणी के समर्थन में निर्भर करते हैं, दिनांक 10/07/2023 को या उससे पहले प्रस्तुत कर सकते हैं या करवा सकते हैं।

You may submit or cause to submit any evidence on which you may rely in support of your return of income electronically in 'e-Proceedings' facility through your account in e-Filing website (www.incometax.gov.in) at your convenience on or before 10/07/2023.

आपको विचाराधीन निर्धारण वर्ष के दौरान आपके द्वारा किए गये विभिन्न वित्तीय लेन-देन से संबन्धित सारी जानकारियाँ, दस्तावेज, साक्ष्य इत्यादि एकत्र करने की सलाह दी जाती है। विस्तृत प्रश्नावली या संचार, निर्धारण प्रक्रिया के दौरान जारी किया जा सकता है। जब भी आपको प्रश्नावली या संचार जारी किया जाता है, आपको निर्दिष्ट समयावधि में बिन्दुवार प्रतिक्रिया देने की आवश्यकता है।

It is advised that you should gather all the information, documents, evidences, etc. in respect of various financial

transactions you have entered during the Assessment Year under consideration, which may be relevant for the scrutiny proceedings. Detailed questionnaire(s) or communication may be issued during the course of assessment proceedings. As and when questionnaire(s) or communication is issued, you are required to provide specific point-wise response within the time specified.

ग. कार्यवाही का तरीका क्या होगा?

C. What will be the mode of proceedings?

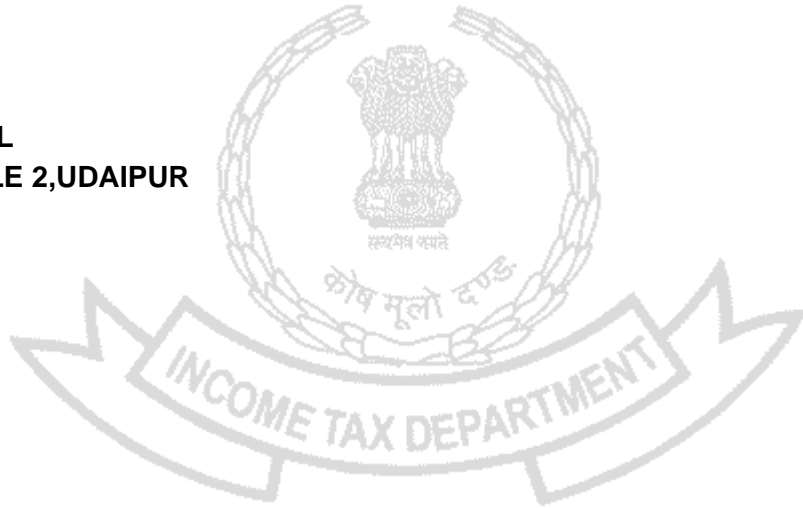
कार्यवाही आपके ई-फाइलिंग वेबसाइट (www.incometax.gov.in) में खाते के माध्यम से 'ई-प्रोसीडिंग्स' सुविधा के द्वारा इलेक्ट्रॉनिक रूप से की जाएगी। 'ई-प्रोसीडिंग्स'/'पहचान विहीन निर्धारण' पर एक संक्षिप्त टिप्पणी ई-फाइलिंग वेबसाइट (www.incometax.gov.in) पर उपलब्ध है।

The proceedings will be conducted electronically in 'e-Proceedings' facility through your account in e-Filing website (www.incometax.gov.in). Brief note on 'e-Proceedings'/'Faceless Assessment' are available on the e-Filing website (www.incometax.gov.in).

With Regards,

Yours faithfully,

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR



घ. सहायता कैसे प्राप्त करें?

D. How to Get Assistance?

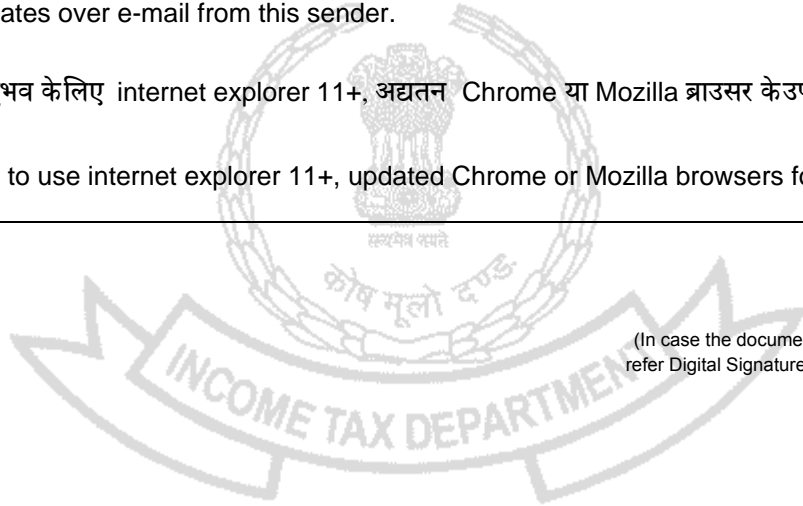
आप टोल फ्री नंबर **1800 103 4215** पर सभी कार्य दिवसों में प्रातः 9:30 से सांय 6:00 तक सम्पर्क कर सकते हैं।

You can also call at Toll Free number **1800 103 4215** from 9:30 a.m. to 6:00 p.m. on all working days.

ड. ध्यान रखने योग्य बातें -

E. Tips to Remember

1. चूंकि संदेशों में आपके वित्तीय लेन-देन से संबन्धित व्यक्तिगत व संवेदनशील जानकारी हो सकती है, अतः आपको आयकर विभाग से सभी संचारों के लिए आपकी व्यक्तिगत/संस्थागत ई-मेल उपयोग करने की दृढ़ता से सलाह दी जाती है।
You are strongly advised to use your personal/ organizational e-mail ID for all the communication with us, since the communication may contain your personal and sensitive information related to your financial transactions.
2. कृपया प्रेषक की ई मेल को श्वेत सूची या सुरक्षित प्रेषक सूची में जोड़ें अन्यथा आपका मेलबॉक्स फिल्टर आपको इस प्रेषक से ई-मेल पर अद्यतन सूचनाएं प्राप्त करने से रोक सकता है।
Please add the sender e-mail to whitelist or safe sender list; else your mailbox filter may stop you from receiving updates over e-mail from this sender.
3. बेहतर उपयोगकर्ता अनुभव के लिए internet explorer 11+, अद्यतन Chrome या Mozilla ब्राउसर के उपयोग की संस्तुति की जाती है।
It is recommended to use internet explorer 11+, updated Chrome or Mozilla browsers for smooth user experience.



(In case the document is digitally signed please refer Digital Signature at the bottom of the page)

This document is digitally signed

Signer: AJAY AGARWAL
Date: Friday, June 21, 2023 11:57 AM
Location: DIRECTORATE, India



GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT COMMISSIONER
OF INCOME TAX
CENTRAL CIRCLE 2,UDAIPUR

To,
MANJU DEVI JAIN
188, TEGORE NAGAR ,SEC NO. 4 HIRAN MAGRI
UDAIPUR 313001,Rajasthan
India

PAN: ADRPJ2998J	AY: 2022-23	Dated: 20/07/2023	DIN & Notice No : ITBA/AST/F/142(1)/2023-24/1054468647(1)
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आयकर अधिनियम, 1961 की धारा 142 की उप-धारा (1) के तहत सूचना
Notice under sub-section (1) of Section 142 of the Income Tax Act, 1961

महोदय/महोदया/मैसर्स
Sir/ Madam/ M/s,

निर्धारण वर्ष 2022-23 के लिए निर्धारण के संबंध में, आपको निम्न करने की आवश्यकता है:
In connection with the assessment for the assessment year 2022-23, you are required to:

- क) 31/07/2023 01:00 PM को या उससे पहले अनुलग्नक के अनुसार मांगे गए खातों और दस्तावेजों को प्रस्तुत करें, अथवा प्रस्तुत कराएं। या
- a) Produce, or cause to be produced, the accounts and documents called for as per annexure on or before 31/07/2023 01:00 PM or
- ख) अनुलग्नक के अनुसार और उसमें निर्दिष्ट बिंदुओं या मामलों पर मांगी गई जानकारी जो कि आयकर नियम, 1962 के नियम 14 के तहत निर्धारित तरीके से सत्यापित हो 31/07/2023 01:00 PM को या उससे पहले प्रस्तुत करें।
- b) Furnish the information called for as per annexure and on the points or matters specified therein and verified in the prescribed manner under Rule 14 of Income-tax Rules, 1962 on or before 31/07/2023 01:00 PM.
- ग) उपरोक्त साक्ष्य/सूचना आयकर विभाग की 'ई-फाइलिंग' वेबसाइट (www.incometax.gov.in) में आपके खाते के माध्यम से 'ई-प्रोसीडिंग्स' सुविधा में इलेक्ट्रॉनिक रूप से प्रस्तुत की जानी है। ई-फाइलिंग वेबसाइट (www.incometax.gov.in) पर 'ई-प्रोसीडिंग्स'/'पहचान विहीन निर्धारण' पर संक्षिप्त नोट उपलब्ध हैं।
- c) The above-mentioned evidence/information is to be furnished electronically in 'e-Proceedings' facility through your account in 'e-Filing' website of Income Tax Department (www.incometax.gov.in). Brief note

Note: If digitally signed, the date of digital signature may be taken as date of document.
,AAYKAR BHAWAN, UDAIPUR, RAJAST, SUBCITY CENTRE, SAVINA, UDAIPUR, Rajasthan, 313001
Email: UDAIPUR.DCIT.CEN2@INCOMETAX.GOV.IN,

Note:- The website address of the e-filing portal has been changed from www.incometaxindiaefiling.gov.in to www.incometax.gov.in.

* DIN- Document identification No.

on 'e-Proceedings'/'Faceless Assessment' are available on the e-Filing website (www.incometax.gov.in).

Yours faithfully,

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR



अनुलग्नक ANNEXURE

1. आयकर अधिनियम, 1961 की धारा 142(1) के तहत निम्नलिखित खाते या दस्तावेज या जानकारी मांगी गई है:
1. The following accounts or documents or information is/are sought under section 142(1) of the Income-tax Act, 1961:

You have filed return of income for A.Y. 2022-23 vide acknowledgement No. 905291410311222 on 31.12.2022. The same has been selected for compulsory scrutiny by issuing notice u/s. 143(2) as per CBDT guidelines for Compulsory selection of returns for complete scrutiny during F.Y. 2023-24. There are certain issues, on which further clarification is required. You are therefore, requested to provide information/explain specific points as mentioned below with relevant documentary evidences:

1. Please provide brief note on the source of income and detail of business activities carried out during the year and method of accounting followed during the A.Y. 2022-23. In case of deviation in method of accounting, please mention and give a note on it.

2. Please provide complete set of following:-

a. Furnish complete return of income filed alongwith computation of total income, income and expenditure account, Audit report, Balance Sheet, Profit & Loss A/c, Manufacturing/Trading a/c with schedules/annexures for the A.Y. 2022-23.

b. Furnish salary certificate alongwith nature of duties performed by you in both concerns. In case of difference in addresses of both concerns, justify your salary income. Intimate your education qualification with proof.

c. Complete details of income from house property alongwith rental agreement (if any), name of tenant with PAN, property details etc. Sources of investment in the property be explained with evidences. Furnish copy of loan statement, if any, with sources of repayment.

d. Complete details of long term capital gain on sale of property such as registry for purchase and sale, sources of investment, proof of cost of improvement etc.

e. Proof of income from other sources, if any. Also explain the sources of investment for deriving such income with evidences and complete details.

f. Complete details of agriculture income declared, if any, such as land details, khasra girdawari, crop details, expenses details, sale bills of mandi etc.

g. Proof of deduction claimed under chapter-VI. Also explain the source of investments thereof.

h. Quantum and nature of income, if any, claimed as exempt during the relevant previous year.

i. If you have held listed/unlisted shares for last three years, please furnish complete details thereof alongwith sources of investment. If the shares were sold in these years, please state whether you have declared profit/gain in the year of sell or not? If yes, give proof. If not, please explain why necessary action as per the Act should not be taken in your hands? Please furnish copy of Demat Account for last years.

j. Sources of investment in assets and liability (schedule-AL of ITR) be explained with relevant

documentary evidences.

k. Provide the comparison of income reported, deductions/exemptions/rebate claimed, current year/carried forwarded loss set-off/adjusted, advance tax paid, self-assessment tax paid, TDS deducted, total tax paid, refund claimed for the current year under consideration and previous two years.

l. Please furnish latest/updated Form 26AS of the year under consideration. Please reconcile the gross receipts as per Form 26AS with your turnover/receipts shown as per your books of accounts/return of income, if any.

m. Whether you have revised the ITR for AY under consideration. If yes, please provide the details of changes made by you in the revised return in comparison to the original ITR filed for the year under consideration.

n. Please furnish details of exempt income with evidences of claim of exempt income, if any. Whether any expenses have been claimed in respect of any exempt income. If yes then submit the complete details of same.

o. Please also state your indulgence in any other business or please state are you also a director/partner in any other company/firm? If yes, please give complete details thereof alongwith income earned therefrom. Furnish copy of your account in the said firm/company.

p. Whether you have declared any undisclosed income or offered any income. If yes, please give complete detail alongwith detail of its generation and accumulation. Please also explain as to why penalty as per the Income-tax Act should not be initiated for disclosure of undisclosed income in the return.

q. Please state whether you have made payment in violation to provision of section 40A(3), 40(a)(ia), 43B, 69C, 269SS, 269T and 269ST etc. If yes, please show cause as to why necessary action as per the Income tax Act should not be taken.

r. Complete details of interest paid and received alongwith its rate.

s. Furnish head-wise TDS ledger with return of TDS (if any).

t. Furnish return of GST (if any).

3. Provide details of all bank accounts held (including the accounts closed during the year). Also furnish complete account statement with explanation regarding credit and debit entries appearing therein:

Name of the bank and branch	Account Number	Type of Account (SB/CA/OD/FD/others)	Interest accrued or received for the A.Y. 2019-20	Held in the name of / belongs to

It is relevant to mention here that during the course of search proceedings, following bank accounts

were noticed as maintained by you:

S.no	Name of the A/c holder	A/c Number	Name of the Bank	Branch Address
1	Manju Devi Jain	668062610000082	Bank of India	3,karjali bhavan,nyay marg,Udaipur,Rajasthan-313001
		1370100026666	BANK OF BARODA	Udaipur main branch,opp.town hall, udaipur,Rajasthan,Udaipur,313001
		50104000159203	IDBI BANK LTD	16,Mumal towers sahel marg , Udaipur

Please furnish complete account statements for the period under consideration explaining credit and debit entries appearing in the said statement.

4. List of sundry creditors with name, address, PAN, credit balance, if applicable.
5. Furnish details of unsecured loans/deposits taken during the year including squared up loan.
6. Give details of the loans, advances and deposits given, including the accounts squared up during the year.
7. Whether you have made any expenditure on any social ceremony like marriage, birthday, religious trip etc. during the year under consideration, if so, give complete details thereof.
8. Regarding all the fixed assets added during the year, submit the following information:-

S.N.	Name, full address of supplier	Bill No. and date	Bill amount + Sales Tax/GST & Excise charged on bill	Date and mode of payment cash / bank a/c cheque No. a/c no. and bank branch	Any other cost such as transportation, interest etc. added into the actual cost.

9. Please furnish complete details of addition/deletion of movable and immovable property during the year with all relevant documentary evidence. Sources of investment be explained with evidences. Please explain the sources of investment/purchase of properties with relevant evidences. Please also furnish copy of registry for verification. Please also give complete details regarding construction activities done on the above properties with sources of construction expenses.
10. Complete details of household expenses alongwith contribution made by family members.
11. During search proceedings, it is gathered that you are having following immovable properties:

SR. NO.	PLOT NO.	AREA(SQ.FIT)	PLACE	ARAJAI NO.	DATE	REGISTRY/PATTA
1	10	1245	MANVA KHEDA	1600-1602	8/20/2008	REGISTRY
2	AGRICULTURE	1 batta 28		4074/4230/294	11/19/2001	REGISTRY
3	3BATAA 40	450 SQ FIT	HOUSEING BOARD GOVERDHAN VILASH		2003/04	
4	21/B	1067.52	SEC.4		2009	
5	AGRICULTURE	1.25	TITRDI		2003	
6	AGRICULTURE	1.5 BIGA	BHANSOL MAVLI		08.05.2019	
7	AGRICULTURE	6BIGA	BHUPAT KEDI BOYNA MAVLI		11.9.2018	

Please explain the sources of investment/purchase of above properties with relevant evidences. Please also furnish copy of registry for verification. Please also give complete details regarding construction activities done on the above properties with sources of construction expenses. If there is any difference in value determined by the Sub-Registrar and sale/purchase consideration, necessary addition should not be made in your hands as per relevant provisions of I.T.Act, 1961.

12. You belong to Akme and Ankur Group, Udaipur where search and survey operations were carried out simultaneously on 23.11.2022 including premises pertains to you. During the course of search, following incriminating documents were found and seized/impounded. These incriminating documents are also related to you and transactions appearing therein are done by you.

S.No.	Premises	Related to	Party No.	Annexure
1.	188, Tagor Nagar, Hiran Magri Sector-4, Udaipur	Nirmal Jain Dipesh Jain Jenisha Jain	Party No. A-1	Exh.1 to 7

		Nirmal Kumar Jain Manju Devi Jain Kartika Jain		
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Please give your explanation on each and every page of these annexure with supporting evidence (in the following format). Please get verified each and every page of these Annexures from the regular books of accounts maintained by you. Please also give details of entries/amounts (Annexure-wise) which are not verifiable from your regular books of accounts alongwith with the reasons as to why the amount involved in these entries/ annexures should not be considered as your undisclosed income.

Annexure	Page No.	Description	Page belongs to	Amount involved
1	2	3	4	5
Whether declared in return/entered in books of accounts	Supporting evidence	Remarks		
6	7	8		

You are also requested to please explain and prove your various contentions with supporting documentary evidence/books of accounts/returns of income filed by respective persons of family members. Please also get verified the sale/purchases vouchers and transaction appeared in various loose papers and notebooks found and seized from regular books of accounts. All photocopies of the said Annexures and statements are supposed to have been provided/given to you by the ADIT/DDIT(Inv.), Udaipur before filing of returns of income.

If the loose paper/documents/entry appeared therein belongs to any other person then please furnish the name and complete address of such person, the name of his Assessing Officer alongwith his confirmation in the form of affidavit. The person should also be produced for verification. Please also explain why such loose paper/documents etc. was lying in your custody. In this regard your attention is also invited to the provisions of section 292C of the I.T. Act, 1961 which deals with presumption as to assets, books of accounts, money, bullion, jewellery etc. found in the possession or control of any person in the course of a search u/s.132 of the Act, it shall be presumed that the assets, books of accounts, money, bullion, jewellery belongs to such person, if he fails to prove it otherwise. You are, therefore, requested to please give your explanation alongwith supporting evidence. In case, you fail to explain the same, please show cause as to why the amount involved should not be treated as unexplained and added in your hands.

13. In respect of land/property transaction appearing in the above annexure as well as pointed out in your statement recorded during the course of search/post search proceedings, please furnish the information in following format:

i. Please furnish the detailed chart in respect of each and every property as mentioned in entire seized material such as:

S.No. / description of property / from whom it was purchased/ amount of purchase consideration / registry value / to whom it was sold / amount of sale consideration / registry value / DLC rate of property / remarks.

ii. Please explain as to how these properties have been acquired by you in your name or in your family member's name. Furnish supporting evidences.

iii. Please explain the source of investment in these properties supported by documentary evidence failing which unexplained investment in these assets will be brought to tax in your hand in the relevant assessment year as income from undisclosed sources.

iv. Please give the mode of payment of consideration amount and details of other relating expenses in respect of above mentioned properties be furnished.

v. Please also intimate after purchasing the immovable properties whether new construction/renovation/addition/alteration in existing building/land has been done, if so, please submit complete details thereof, such nature of addition/alteration/renovation/period/amount of investment made and explain the source of investment.

vi. Please intimate the rental income derived from the properties on their letting out and period from when these are let out and to whom these are let out.

vii. Please also intimate whether the rental incomes of properties are being shown in return of income filed by you, if so, please produce necessary evidence in this regard.

viii. Please produce Khasra of agricultural land and give the name of the person who is carrying out farming on your agricultural land. Produce evidence regarding agreement with the farmer, if any, as well as produce evidence regarding agricultural income.

ix. If any of the above named properties have been resold after purchase, please intimate the same and give full particulars alongwith necessary documentary evidences.

x. As per available details, the above mentioned properties have been purchased at lower value than the rate stipulated for the area. Please state and explain why it should not be treated as deemed investment.

xi. If the property belongs to any other person/your family members, please furnish name and address of the person alongwith his confirmation in the form of affidavit. The person should also be produced for verification. Please also explain why the property belonging to the other person is lying in your possession.

xii. If there is any difference in value determined by the Sub-Registrar and sale/purchase consideration, necessary addition should not be made in your hands as per relevant provisions of I.T. Act, 1961.

14. Furnish/upload soft copy of relevant books of account as maintained. Also provide soft copy of day to day cash book (with narration).

15. You may submit your reply electronically through 'e-Proceedings' facility.

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR

(In case the document is digitally signed please
refer Digital Signature at the bottom of the page)





GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT COMMISSIONER
OF INCOME TAX
CENTRAL CIRCLE 2,UDAIPUR

To,
MANJU DEVI JAIN
188, TEGORE NAGAR ,SEC NO. 4 HIRAN MAGRI
UDAIPUR 313001,Rajasthan
India

PAN: ADRPJ2998J	AY: 2022-23	Dated: 18/01/2024	DIN & Notice No : ITBA/AST/F/142(1)/2023-24/1059868611(1)
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आयकर अधिनियम, 1961 की धारा 142 की उप-धारा (1) के तहत सूचना
Notice under sub-section (1) of Section 142 of the Income Tax Act, 1961

महोदय/महोदया/मैसर्स
Sir/ Madam/ M/s,

निर्धारण वर्ष 2022-23 के लिए निर्धारण के संबंध में, आपको निम्न करने की आवश्यकता है:
In connection with the assessment for the assessment year 2022-23, you are required to:

- क) 24/01/2024 11:47 AM को या उससे पहले अनुलग्नक के अनुसार मांगे गए खातों और दस्तावेजों को प्रस्तुत करें, अथवा प्रस्तुत कराएं। या
- a) Produce, or cause to be produced, the accounts and documents called for as per annexure on or before 24/01/2024 11:47 AM or
- ख) अनुलग्नक के अनुसार और उसमें निर्दिष्ट बिंदुओं या मामलों पर मांगी गई जानकारी जो कि आयकर नियम, 1962 के नियम 14 के तहत निर्धारित तरीके से सत्यापित हो 24/01/2024 11:47 AM को या उससे पहले प्रस्तुत करें।
- b) Furnish the information called for as per annexure and on the points or matters specified therein and verified in the prescribed manner under Rule 14 of Income-tax Rules, 1962 on or before 24/01/2024 11:47 AM.
- ग) उपरोक्त साक्ष्य/सूचना आयकर विभाग की 'ई-फाइलिंग' वेबसाइट (www.incometax.gov.in) में आपके खाते के माध्यम से 'ई-प्रोसीडिंग्स' सुविधा में इलेक्ट्रॉनिक रूप से प्रस्तुत की जानी है। ई-फाइलिंग वेबसाइट (www.incometax.gov.in) पर 'ई-प्रोसीडिंग्स'/'पहचान विहीन निर्धारण' पर संक्षिप्त नोट उपलब्ध हैं।
- c) The above-mentioned evidence/information is to be furnished electronically in 'e-Proceedings' facility through your account in 'e-Filing' website of Income Tax Department (www.incometax.gov.in). Brief note

Note: If digitally signed, the date of digital signature may be taken as date of document.
,AAYKAR BHAWAN, UDAIPUR, RAJAST, SUBCITY CENTRE, SAVINA, UDAIPUR, Rajasthan, 313001
Email: UDAIPUR.DCIT.CEN2@INCOMETAX.GOV.IN,

Note:- The website address of the e-filing portal has been changed from www.incometaxindiaefiling.gov.in to www.incometax.gov.in.

* DIN- Document identification No.

on 'e-Proceedings'/'Faceless Assessment' are available on the e-Filing website (www.incometax.gov.in).

Yours faithfully,

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR



अनुलग्नक ANNEXURE

1. आयकर अधिनियम, 1961 की धारा 142(1) के तहत निम्नलिखित खाते या दस्तावेज या जानकारी मांगी गई है:
1. The following accounts or documents or information is/are sought under section 142(1) of the Income-tax Act, 1961:

You have filed return of income for A.Y. 2022-23 vide acknowledgement No. 905291410311222 on 31.12.2022. The same has been selected for compulsory scrutiny by issuing notice u/s. 143(2) as per CBDT guidelines for Compulsory selection of returns for complete scrutiny during F.Y. 2023-24. There are certain issues, on which further clarification was required. Therefore, notice u/s. 142(1) was issued to you on 20.07.2023. In response to which, you have filed written submission which has been considered carefully and it is found to be part submission. You have not replied with all the queries as raised vide notice dated 20.07.2023. You are therefore, once again requested to provide information/explain specific points as mentioned below with relevant documentary evidences:

1. Furnish income & expenditure account for the year under consideration.
2. Please explain the debit/credit entries appearing in the relevant bank account statement. Please also furnish copy of detailed account in respect of person having transaction of debit/credit exceeding Rs. 1 Lac.
3. The relevant details of investment in share and copy of demat account were called for but the same has not been furnished except copy of demat account. You are required to furnish ledger account in respect of share transaction. Please submit detailed ledger account in respect of share transaction. Please also furnish your account in the books of your broker from the date of 01.04.2014 to 31.03.2023. It is undisputed fact that you are belonging to Akme & Ankur Group where search and seizure action was conducted including you. You have also been indulged in sale and purchase of shares of group company of Akme & Ankur Group. Please furnish complete details of sale and purchase of shares of all companies related to Akme Group as appearing your demat account. Please furnish your account in the books of these companies for A.Y. 2014-15 to 2023-24. Please also furnish relevant bank account statement indicating relevant entries therein. If the said share dematerialized during the year, then please furnish your account in the books of related company from the date of issuing share in physical form.
4. In respect of seized material, you have replied that:

11. With reference to search and survey operations were carried out on 23.11.2022 in Akme and Ankur Group, Udaipur and simultaneously including premises pertains to me. During the course of search, no document was found and seized/impounded which was directly related to me.

The reply furnished by you in respect of material seized from your residence is not the manner as asked for and not in accordance to the provisions of section 292C. Please furnish reply in the manner as asked for vide query letter dated 20.07.2023.

5. You have filed your return of income for A.Y. 2022-23 after the due date. During the course of assessment proceedings, you have furnished revised computation of total income by reducing STCG

on sale of property. Please justify your claim by putting up relevant provisions of the Income Tax Act, 1961. Please also file return of income of Shri Mohan Lal for A.Y. 2021-22 from whom the alleged land was purchased in the year 2020.

6. You are requested to submit your reply electronically through 'e-Proceedings' facility.

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR



(In case the document is digitally signed please refer Digital Signature at the bottom of the page)

This document is digitally signed

Signer: AJAY AGARWAL
Date: Thursday, January 18, 2024 2:55 PM
Location: DIRECTORATE, India



GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT
COMMISSIONER OF INCOME TAX
CENTRAL CIRCLE 2, UDAIPUR

To,
MANJU DEVI JAIN
188, TEGORE NAGAR , SEC NO. 4 HIRAN
MAGRI
UDAIPUR 313001 , Rajasthan
India

PAN: ADRPJ2998J	A.Y: 2020-21	Dated: 20/02/2024	DIN & Notice No: ITBA/AST/S/148_1/2023-24/1061227668(1)
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Notice under section 148 of the Income-tax Act, 1961

Sir/Madam/ M/s.

- I have information that a search was initiated under section 132 of the Act in your case or in the case of the person in respect of which you are the assessable under the Act on the date 24/11/2022.
This notice is being issued after obtaining the prior approval of the **PCIT (Central), Jaipur** accorded on date vide Reference No. **10000047644210**.
- I, therefore, propose to assess or reassess such income or recompute the loss or the depreciation allowance or any other allowance or deduction for the Assessment Year **2020-21** and I, hereby, require you to furnish, within **90** days from the service of this notice, a return in the prescribed form for the Assessment Year **2020-21**.

AJAY AGARWAL
CENTRAL CIRCLE 2, UDAIPUR

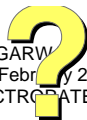
(In case the document is digitally signed please refer Digital Signature at the bottom of the page)

Note: If digitally signed, the date of digital signature may be taken as date of document.
,AAYKAR BHAWAN, UDAIPUR, RAJAST, SUBCITY CENTRE, SAVINA, UDAIPUR, Rajasthan. 313001
Email: UDAIPUR.DCIT.CEN2@INCOMETAX.GOV.IN,

Note:- The website address of the e-filing portal has been changed from www.incometaxindiaefiling.gov.in to www.inco
* DIN-Documents identification No.

This document is digitally signed

Signer: AJAY AGARWAL
Date: Tuesday, February 20, 2024 11:11 PM
Location: DIRECTORATE, India





GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT
COMMISSIONER OF INCOME TAX
CENTRAL CIRCLE 2,UDAIPUR

To,
MANJU DEVI JAIN
188, TEGORE NAGAR , SEC NO. 4 HIRAN
MAGRI
UDAIPUR 313001 , Rajasthan
India

PAN: ADRPJ2998J	A.Y: 2021-22	Dated: 20/02/2024	DIN & Notice No: ITBA/AST/S/148_1/2023-24/1061227660(1)
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Notice under section 148 of the Income-tax Act,1961

Sir/Madam/ M/s.

- I have information that a search was initiated under section 132 of the Act in your case or in the case of the person in respect of which you are the assessable under the Act on the date 24/11/2022.
This notice is being issued after obtaining the prior approval of the **PCIT (Central), Jaipur** accorded on date vide Reference No. **10000047644250**.
- I, therefore, propose to assess or reassess such income or recompute the loss or the depreciation allowance or any other allowance or deduction for the Assessment Year **2021-22** and I, hereby, require you to furnish, within **90** days from the service of this notice, a return in the prescribed form for the Assessment Year **2021-22**.

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR

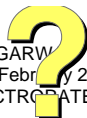
(In case the document is digitally signed please refer Digital Signature at the bottom of the page)

Note: If digitally signed, the date of digital signature may be taken as date of document.
AAVKAR BHAWAN, UDAIPUR, RAJAST, SUBCITY CENTRE, SAVINA, UDAIPUR, Rajasthan. 313001
Email: UDAIPUR.DCIT.CEN2@INCOMETAX.GOV.IN,

Note:- The website address of the e-filing portal has been changed from www.incometaxindiaefiling.gov.in to www.inco
* DIN-Documents identification No.

This document is digitally signed

Signer: AJAY AGARWAL
Date: Tuesday, February 20, 2024 11:11 PM
Location: DIRECTORATE, India





GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT COMMISSIONER
OF INCOME TAX
CENTRAL CIRCLE 2,UDAIPUR

To,
NIRMAL KUMAR JAIN
188 TEGORE NAGAR, SEC NO. 4 HIRAN MAGRI
UDAIPUR 313001, Rajasthan
India

PAN: ADJPJ1116G	AY: 2019-20	Dated: 07/08/2023	DIN & Notice No : ITBA/AST/F/142(1)/2023-24/1054916459(1)
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आयकर अधिनियम, 1961 की धारा 142 की उप-धारा (1) के तहत सूचना
Notice under sub-section (1) of Section 142 of the Income Tax Act, 1961

महोदय/महोदया/मैसर्स
Sir/ Madam/ M/s,

निर्धारण वर्ष 2019-20 के लिए निर्धारण के संबंध में, आपको निम्न करने की आवश्यकता है:
In connection with the assessment for the assessment year 2019-20, you are required to:

- क) 16/08/2023 11:30 AM को या उससे पहले अनुलग्नक के अनुसार मांगे गए खातों और दस्तावेजों को प्रस्तुत करें, अथवा प्रस्तुत कराएं। या
- a) Produce, or cause to be produced, the accounts and documents called for as per annexure on or before 16/08/2023 11:30 AM or
- ख) अनुलग्नक के अनुसार और उसमें निर्दिष्ट बिंदुओं या मामलों पर मांगी गई जानकारी जो कि आयकर नियम, 1962 के नियम 14 के तहत निर्धारित तरीके से सत्यापित हो 16/08/2023 11:30 AM को या उससे पहले प्रस्तुत करें।
- b) Furnish the information called for as per annexure and on the points or matters specified therein and verified in the prescribed manner under Rule 14 of Income-tax Rules, 1962 on or before 16/08/2023 11:30 AM.
- ग) उपरोक्त साक्ष्य/सूचना आयकर विभाग की 'ई-फाइलिंग' वेबसाइट (www.incometax.gov.in) में आपके खाते के माध्यम से 'ई-प्रोसीडिंग्स' सुविधा में इलेक्ट्रॉनिक रूप से प्रस्तुत की जानी है। ई-फाइलिंग वेबसाइट (www.incometax.gov.in) पर 'ई-प्रोसीडिंग्स'/'पहचान विहीन निर्धारण' पर संक्षिप्त नोट उपलब्ध हैं।
- c) The above-mentioned evidence/information is to be furnished electronically in 'e-Proceedings' facility through your account in 'e-Filing' website of Income Tax Department (www.incometax.gov.in). Brief note

Note: If digitally signed, the date of digital signature may be taken as date of document.
,AAYKAR BHAWAN, UDAIPUR, RAJAST, SUBCITY CENTRE, SAVINA, UDAIPUR, Rajasthan, 313001
Email: UDAIPUR.DCIT.CEN2@INCOMETAX.GOV.IN,

Note:- The website address of the e-filing portal has been changed from www.incometaxindiaefiling.gov.in to www.incometax.gov.in.

* DIN- Document identification No.

on 'e-Proceedings'/'Faceless Assessment' are available on the e-Filing website (www.incometax.gov.in).

Yours faithfully,

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR



अनुलग्नक ANNEXURE

1. आयकर अधिनियम, 1961 की धारा 142(1) के तहत निम्नलिखित खाते या दस्तावेज या जानकारी मांगी गई है:
1. **The following accounts or documents or information is/are sought under section 142(1) of the Income-tax Act, 1961:**

This office has information that a search was initiated under section 132 of the Income Tax Act, 1961 in your case on the date 23/11/2022. Therefore, notice u/s. 148 of the I.T.Act, 1961 was issued on 29.03.2023 with prior approval of specified authority. It was proposed to assess or reassess such income or re-compute the loss or the depreciation allowance or any other allowance or deduction for the Assessment Year 2019-20 and you were, therefore, required to furnish, within 30 days from the service of this notice, a return in the prescribed form for the Assessment Year 2019-20. In response to said notice u/s. 148 of the Act, you have filed return of income u/s. 148 for A.Y. 2019-20 vide acknowledgement No. 129446420280423 on 28.04.2023 but the same has not been e-verified as yet and hence liable to be treated as invalid and as if no return is filed. There are certain issues, on which further clarification is required to complete assessment.. You are therefore, requested to provide information/explain specific points as mentioned below with relevant documentary evidences:

1. Please provide brief note on the source of income and detail of business activities carried out during the year and method of accounting followed during the A.Y. 2019-20. In case of deviation in method of accounting, please mention and give a note on it.
2. Please provide complete set of following:-
 - a. Furnish complete return of income filed originally u/s. 139 of the Act alongwith computation of total income, income and expenditure account, Audit report, Balance Sheet, Profit & Loss A/c, Manufacturing/Trading a/c with schedules/annexures for the A.Y. 2019-20. In similar manner, please also file complete valid return of income filed u/s. 148, if any, with income and expenditure account, Audit report, Balance Sheet, Profit & Loss A/c, Manufacturing/Trading a/c with schedules/annexures for the A.Y. 2019-20.
 - b. Furnish salary certificate alongwith nature of duties performed by you in both concerns.
 - c. Proof of income from other sources (interest). Also explain the sources of investment for deriving such income with evidences and complete details.
 - d. Proof of deduction claimed under chapter-VI. Also explain the source of investments thereof.
 - e. Quantum and nature of income, if any, claimed as exempt during the relevant previous year.
 - f. If you have held listed/unlisted shares for last three years, please furnish complete details thereof alongwith sources of investment. If the shares were sold in these years, please state whether you have declared profit/gain in the year of sell or not? If yes, give proof. If not, please explain why necessary action as per the Act should not be taken in your hands?
 - g. Provide the comparison of income reported, deductions/exemptions/rebate claimed, current year/carried forwarded loss set-off/adjusted, advance tax paid, self-assessment tax paid, TDS deducted, total tax paid, refund claimed for the current year under consideration and previous two years.

h. Please furnish latest/updated Form 26AS of the year under consideration. Please reconcile the gross receipts as per Form 26AS with your turnover/receipts shown as per your books of accounts/return of income, if any.

i. Whether you have revised the ITR for AY under consideration. If yes, please provide the details of changes made by you in the revised return in comparison to the original ITR filed for the year under consideration.

j. Please furnish details of exempt income with evidences of claim of exempt income, if any. Whether any expenses have been claimed in respect of any exempt income. If yes then submit the complete details of same.

k. Please also state your indulgence in any other business or please state are you also a director/partner in any other company/firm? If yes, please give complete details thereof alongwith income earned therefrom. Furnish copy of your account in the said firm/company.

l. Whether you have declared any undisclosed income or offered any income. If yes, furnish its complete detail alongwith detail of its generation and accumulation. Please also explain as to why penalty as per the Income-tax Act should not be initiated for disclosure of undisclosed income in the return.

m. Please state whether you have made payment in violation to provision of section 40A(3), 40(a)(ia), 43B, 69C, 269SS, 269T and 269ST etc. If yes, please show cause as to why necessary action as per the Income tax Act should not be taken.

n. Complete details of interest paid and received alongwith its rate.

o. Furnish head-wise TDS ledger with return of TDS (if any).

p. Furnish return of GST (if any).

3. Provide details of all bank accounts held (including the accounts closed during the year). Also furnish complete account statement with explanation regarding credit and debit entries appearing therein:

Name of the bank and branch	Account Number	Type of Account (SB/CA/OD/FD/others)	Interest accrued or received for the A.Y. 2019-20	Held in the name of / belongs to

It is relevant to mention here that during the course of search proceedings, following bank accounts were noticed as maintained by you:

S.no	Name of the A/c holder	A/c Number	Name of the Bank	Branch Address
1	Nirmal Kumar Jain	050104000159180	IDBI Bank Ltd	16,Mumal towers sahel marg , Udaipur
		050653700000912	IDBI Bank Ltd	16,Mumal towers sahel marg , Udaipur
		668025110000013	Bank of India	3,karjali bhavan,nyay marg,Udaipur,Rajasthan-313001
		668062610000074	Bank of India	
		668010110006840	Bank of India	
		11347276327	RMGB	

Please furnish complete account statements for the period under consideration explaining credit and debit entries appearing in the said statement.

4. List of sundry creditors with name, address, PAN, credit balance, if applicable.
5. Furnish details of unsecured loans/deposits taken during the year including squared up loan.
6. Give details of the loans, advances and deposits given, including the accounts squared up during the year.
7. Whether you have made any expenditure on any social ceremony like marriage, birthday, religious trip etc. during the year under consideration, if so, give complete details thereof.
8. Regarding all the fixed assets added during the year, submit the following information:-

S.N.	Name, full address of supplier	Bill No. and date	Bill amount + Sales Tax/GST & Excise charged on bill	Date and mode of payment cash / bank a/c cheque No. a/c no. and bank branch	Any other cost such as transportation, interest etc. added into the actual cost.

9. Please furnish complete details of addition/deletion of movable and immovable property during the year with all relevant documentary evidence. Sources of investment be explained with evidences. Please explain the sources of investment/purchase of properties with relevant evidences. Please also

furnish copy of registry for verification. Please also give complete details regarding construction activities done on the above properties with sources of construction expenses.

10. Complete details of household expenses alongwith contribution made by family members.

11. During search proceedings, it is gathered that you are having following immovable properties:

SR. NO.	PLOT NO.	AREA(SQ.FIT)	PLACE	ARAJAI NO.	DATE	REGISTRY/PATTA
1	8	3200	BALICHA	181, 182,188 TO 190	2/25/2005	PATTA
2	3	6600	DEWALI	678 679	12/31/2003	PATTA
3	4	5280	DEWALI	678 679	7/20/2012	REGISTRY
4	51	3064.3	DEWALI	1153/659	9/29/2014	REGISTRY
5	14	1500	NELA	1797	3/16/2006	PATTA
6	15	1500	NELA	1797	3/16/2006	PATTA
7	37	2039.3	NELA	1797	3/16/2006	PATTA
8	AGRICULTURE	1 batta 28		4074/4230/294	5/22/2008	REGISTRY
9	4	1920	MADRI PANERIO	1700 1703	12/3/2005	PATTA
10	172/173/176	8487	DEWALI	151, 155 -164		
11	174	2346	DEWALI	151, 155 -164		
12	175	2346	DEWALI	151, 155 -164		
13	2,3	9120	SAVINA KHEDA	858, 859,863-870		PATTA

SR. NO.	PLOT NO.	AREA(SQ.FIT)	PLACE	ARAJAI NO.	DATE	REGISTRY/PATTA
14	4	2479	MANVA KHEDA			
15	11	1050	MANVA KHEDA			
16	164	2100	DEWALI 713		10/20/2003	PATTA
17	34	2400 SQ.FIT.	SHANTI NAGER LODHA HOUSE SEC.3			
18	AGRICULTURE	1.5 BIGA	BHANSOL MAVLI		08.05.2019	
19	AGRICULTURE	1 BIGHA	DIWALI		9/23/2013	
20	188	2400 SQ.FIT	REGI. HOUSE TAGORE NAGER SEC.4		1997	

Please explain the sources of investment/purchase of above properties with relevant evidences. Please also furnish copy of registry for verification. Please also give complete details regarding construction activities done on the above properties with sources of construction expenses. If there is any difference in value determined by the Sub-Registrar and sale/purchase consideration, necessary addition should not be made in your hands as per relevant provisions of I.T.Act, 1961.

12. You belong to Akme and Ankur Group, Udaipur, where search and survey operations were carried out simultaneously on 23.11.2022 including premises pertains to you. During the course of search, following incriminating documents were found and seized/impounded. These incriminating documents are also related to you and transactions appearing therein are done by you.

S.No.	Premises	Related to	Party No.	Annexure
1.	188, Tagor Nagar, Hiran Magri Sector-4, Udaipur	Nirmal Jain	Party No. A-1	Exh.1 to 7

		Dipesh Jain Jenisha Jain Nirmal Kumar Jain Manju Devi Jain Kartika Jain		
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Please give your explanation on each and every page of these annexure with supporting evidence (in the following format). Please get verified each and every page of these Annexures from the regular books of accounts maintained by you. Please also give details of entries/amounts (Annexure-wise) which are not verifiable from your regular books of accounts alongwith with the reasons as to why the amount involved in these entries/ annexures should not be considered as your undisclosed income.

Annexure	Page No.	Description	Page belongs to	Amount involved
1	2	3	4	5
Whether declared in return/entered in books of accounts	Supporting evidence	Remarks		
6	7	8		

You are also requested to please explain and prove your various contentions with supporting documentary evidence/books of accounts/returns of income filed by respective persons of family members. Please also get verified the sale/purchases vouchers and transaction appeared in various loose papers and notebooks found and seized from regular books of accounts. All photocopies of the said Annexures and statements are supposed to have been provided/given to you by the ADIT/DDIT(Inv.), Udaipur before filing of returns of income.

If the loose paper/documents/entry appeared therein belongs to any other person then please furnish the name and complete address of such person, the name of his Assessing Officer alongwith his confirmation in the form of affidavit. The person should also be produced for verification. Please also explain why such loose paper/documents etc. was lying in your custody. In this regard your attention is also invited to the provisions of section 292C of the I.T. Act, 1961 which deals with presumption as to assets, books of accounts, money, bullion, jewellery etc. found in the possession or control of any person in the course of a search u/s.132 of the Act, it shall be presumed that the assets, books of accounts, money, bullion, jewellery belongs to such person, if he fails to prove it otherwise. You are therefore; requested to please give your explanation alongwith supporting evidence. In case, you fail to explain the same, please show cause as to why the amount involved should not be treated as unexplained and added in your hands.

13. In respect of land/property transaction appearing in the above annexure as well as pointed out in your statement recorded during the course of search/post search proceedings, please furnish the information in following format:

i. Please furnish the detailed chart in respect of each and every property as mentioned in entire seized material such as :

S.No. / description of property / from whom it was purchased / amount of purchase consideration / registry value / to whom it was sold / amount of sale consideration / registry value / DLC rate of property / remarks.

ii. Please explain as to how these properties have been acquired by you in your name or in your family member's name. Furnish supporting evidences.

iii. Please explain the source of investment in these properties supported by documentary evidence failing which unexplained investment in these assets will be brought to tax in your hand in the relevant assessment year as income from undisclosed sources.

iv. Please give the mode of payment of consideration amount and details of other relating expenses in respect of above mentioned properties be furnished.

v. Please also intimate after purchasing the immovable properties whether new construction/renovation/addition/alteration in existing building/land has been done, if so, please submit complete details thereof, such nature of addition/alteration/renovation/period/amount of investment made and explain the source of investment.

vi. Please intimate the rental income derived from the properties on their letting out and period from when these are let out and to whom these are let out.

vii. Please also intimate whether the rental incomes of properties are being shown in return of income filed by you, if so, please produce necessary evidence in this regard.

viii. Please produce Khasra of agricultural land and give the name of the person who is carrying out farming on your agricultural land. Produce evidence regarding agreement with the farmer, if any, as well as produce evidence regarding agricultural income.

ix. If any of the above named properties have been resold after purchase, please intimate the same and give full particulars alongwith necessary documentary evidences.

x. As per available details, the above mentioned properties have been purchased at lower value than the rate stipulated for the area. Please state and explain why it should not be treated as deemed investment.

xi. If the property belongs to any other person/your family members, please furnish name and address of the person alongwith his confirmation in the form of affidavit. The person should also be produced for verification. Please also explain why the property belonging to the other person is lying in your possession.

xii. If there is any difference in value determined by the Sub-Registrar and sale/purchase consideration, why necessary addition should not be made in your hands as per relevant provisions of I.T.Act, 1961.

14. Furnish/upload soft copy of relevant books of account as maintained. Also provide soft copy of day to day cash book (with narration).
15. You may submit your reply electronically through 'e-Proceedings' facility.

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR



(In case the document is digitally signed please refer Digital Signature at the bottom of the page)

This document is digitally signed

Signer: AJAY AGARWAL
Date: Monday, August 14, 2023 4:32 PM
Location: DIRECTORATE, India



GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT COMMISSIONER
OF INCOME TAX
CENTRAL CIRCLE 2,UDAIPUR

To,
NIRMAL KUMAR JAIN
188 TEGORE NAGAR, SEC NO. 4 HIRAN MAGRI
UDAIPUR 313001, Rajasthan
India

PAN: ADJPJ1116G	AY: 2019-20	Dated: 09/12/2023	DIN & Notice No : ITBA/AST/F/142(1)/2023-24/1058611546(1)
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आयकर अधिनियम, 1961 की धारा 142 की उप-धारा (1) के तहत सूचना
Notice under sub-section (1) of Section 142 of the Income Tax Act, 1961

महोदय/महोदया/मैसर्स
Sir/ Madam/ M/s,

निर्धारण वर्ष 2019-20 के लिए निर्धारण के संबंध में, आपको निम्न करने की आवश्यकता है:
In connection with the assessment for the assessment year 2019-20, you are required to:

- क) 14/12/2023 12:58 PM को या उससे पहले अनुलग्नक के अनुसार मांगे गए खातों और दस्तावेजों को प्रस्तुत करें, अथवा प्रस्तुत कराएं। या
- a) Produce, or cause to be produced, the accounts and documents called for as per annexure on or before 14/12/2023 12:58 PM or
- ख) अनुलग्नक के अनुसार और उसमें निर्दिष्ट बिंदुओं या मामलों पर मांगी गई जानकारी जो कि आयकर नियम, 1962 के नियम 14 के तहत निर्धारित तरीके से सत्यापित हो 14/12/2023 12:58 PM को या उससे पहले प्रस्तुत करें।
- b) Furnish the information called for as per annexure and on the points or matters specified therein and verified in the prescribed manner under Rule 14 of Income-tax Rules, 1962 on or before 14/12/2023 12:58 PM.
- ग) उपरोक्त साक्ष्य/सूचना आयकर विभाग की 'ई-फाइलिंग' वेबसाइट (www.incometax.gov.in) में आपके खाते के माध्यम से 'ई-प्रोसीडिंग्स' सुविधा में इलेक्ट्रॉनिक रूप से प्रस्तुत की जानी है। ई-फाइलिंग वेबसाइट (www.incometax.gov.in) पर 'ई-प्रोसीडिंग्स'/'पहचान विहीन निर्धारण' पर संक्षिप्त नोट उपलब्ध हैं।
- c) The above-mentioned evidence/information is to be furnished electronically in 'e-Proceedings' facility through your account in 'e-Filing' website of Income Tax Department (www.incometax.gov.in). Brief note

Note: If digitally signed, the date of digital signature may be taken as date of document.
,AAYKAR BHAWAN, UDAIPUR, RAJAST, SUBCITY CENTRE, SAVINA, UDAIPUR, Rajasthan, 313001
Email: UDAIPUR.DCIT.CEN2@INCOMETAX.GOV.IN,

Note:- The website address of the e-filing portal has been changed from www.incometaxindiaefiling.gov.in to www.incometax.gov.in.

* DIN- Document identification No.

on 'e-Proceedings'/'Faceless Assessment' are available on the e-Filing website (www.incometax.gov.in).

Yours faithfully,

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR



अनुलग्नक ANNEXURE

1. आयकर अधिनियम, 1961 की धारा 142(1) के तहत निम्नलिखित खाते या दस्तावेज या जानकारी मांगी गई है:
1. The following accounts or documents or information is/are sought under section 142(1) of the Income-tax Act, 1961:

This office has information that a search was initiated under section 132 of the Income Tax Act, 1961 in your case on the date 23/11/2022. Therefore, notice u/s. 148 of the I.T.Act, 1961 was issued on 29.03.2023 with prior approval of specified authority. It was proposed to assess or reassess such income or re-compute the loss or the depreciation allowance or any other allowance or deduction for the Assessment Year 2019-20 and you were, therefore, required to furnish, within 30 days from the service of this notice, a return in the prescribed form for the Assessment Year 2019-20. In response to said notice u/s. 148 of the Act, you have filed return of income u/s. 148 for A.Y. 2019-20 vide acknowledgement No. 129446420280423 on 28.04.2023 but the same has not been e-verified as yet and hence liable to be treated as invalid and as if no return is filed. There are certain issues, on which further clarification was required. Therefore, notice u/s. 142(1) was issued to you on 07.08.2023. In response to which, you have filed part written submission which has been considered carefully and it is found that you have not replied with all the queries as raised vide notice dated 07.08.2023. You are therefore, once again requested to provide information/explain specific points as mentioned below with relevant documentary evidences:

1. Please furnish complete details of agriculture income alongwith copy of registry of agriculture land, khasra girdawari, mandi bill, expenses voucher etc. for verification.
2. Please justify your claim of deduction u/s 80U claimed at 125000/-. On perusal of certificate, you have mentioned 50% disability and as per provisions of section 80U, you are eligible for claiming deduction only 75000/-. Please show cause as to why excess claim should not be disallowed.
3. On perusal of demat account furnished, it is gathered that the same is related to Smt. Manju Jain. Please furnish the same in your name and explain the sources of investment in equity appearing therein.
4. Also give complete details of dividend received with proof.
5. Justify your claim of exemption u/s. 10(38) on LTCG with relevant documentary evidences.
6. Please furnish confirmation of Shri Kalu Jain alongwith his address, PAN, ITR and relevant account statement. Also furnish the sources of loan. Also prove nexus between amount of loan given and loan taken. Also intimate the rate of interest charged and paid.
7. On perusal of bank account statement of IDBI, it is seen that you have entered into some transactions with the following persons/entities. Please furnish complete details of such transaction, relevancy with you and also give complete name, address, PAN and their ITR for verification:

Rajesh Toshniwal, Akme Fintrade, Star Housing, The Coronation, Dipesh Jain.

1. Proof of deduction u/s. 80C.
2. The following queries are still to be complied with. You are hereby given another opportunity of being heard to comply with same.
4. List of sundry creditors with name, address, PAN, credit balance, if applicable.
5. Furnish details of unsecured loans/deposits taken during the year including squared up loan.

6. Give details of the loans, advances and deposits given, including the accounts squared up during the year.
7. Whether you have made any expenditure on any social ceremony like marriage, birthday, religious trip etc. during the year under consideration, if so, give complete details thereof.
8. Regarding all the fixed assets added during the year, submit the following information:-

S.N.	Name, full address of supplier	Bill No. and date	Bill amount + Sales Tax/GST & Excise charged on bill	Date and mode of payment cash / bank a/c cheque No. a/c no. and bank branch	Any other cost such as transportation, interest etc. added into the actual cost.

9. Please furnish complete details of addition/deletion of movable and immovable property during the year with all relevant documentary evidence. Sources of investment be explained with evidences. Please explain the sources of investment/purchase of properties with relevant evidences. Please also furnish copy of registry for verification. Please also give complete details regarding construction activities done on the above properties with sources of construction expenses.

10. Complete details of household expenses alongwith contribution made by family members.

11. During search proceedings, it is gathered that you are having following immovable properties:

SR. NO.	PLOT NO.	AREA(SQ.FIT)	PLACE	ARAJAI NO.	DATE	REGISTRY/PATTA
1	8	3200	BALICHA	181, 182,188 TO 190	2/25/2005	PATTA
2	3	6600	DEWALI	678 679	12/31/2003	PATTA
3	4	5280	DEWALI	678 679	7/20/2012	REGISTRY
4	51	3064.3	DEWALI	1153/659	9/29/2014	REGISTRY
5	14	1500	NELA	1797	3/16/2006	PATTA
6	15	1500	NELA	1797	3/16/2006	PATTA

SR. NO.	PLOT NO.	AREA(SQ.FIT)	PLACE	ARAJAI NO.	DATE	REGISTRY/PATTA
7	37	2039.3	NELA	1797	3/16/2006	PATTA
8	AGRICULTURE	1 batta 28		4074/4230/294	5/22/2008	REGISTRY
9	4	1920	MADRI PANERIO	1700 1703	12/3/2005	PATTA
10	172/173/176	8487	DEWALI	151, 155 -164		
11	174	2346	DEWALI	151, 155 -164		
12	175	2346	DEWALI	151, 155 -164		
13	2,3	9120	SAVINA KHEDA	858, 859,863-870		PATTA
14	4	2479	MANVA KHEDA			
15	11	1050	MANVA KHEDA			
16	164	2100	DEWALI 713		10/20/2003	PATTA
17	34	2400 SQ.FIT.	SHANTI NAGER LODHA HOUSE SEC.3			
18	AGRICULTURE	1.5 BIGA	BHANSOL MAVLI		08.05.2019	
19	AGRICULTURE	1 BIGHA	DIWALI		9/23/2013	

SR. NO.	PLOT NO.	AREA(SQ.FIT)	PLACE	ARAJAI NO.	DATE	REGISTRY/PATTA
20	188	2400 SQ.FIT	REGI. HOUSE TAGORE NAGER SEC.4		1997	

Please explain the sources of investment/purchase of above properties with relevant evidences. Please also furnish copy of registry for verification. Please also give complete details regarding construction activities done on the above properties with sources of construction expenses. If there is any difference in value determined by the Sub-Registrar and sale/purchase consideration, necessary addition should not be made in your hands as per relevant provisions of I.T.Act, 1961.

12. You belong to Akme and Ankur Group, Udaipur, where search and survey operations were carried out simultaneously on 23.11.2022 including premises pertains to you. During the course of search, following incriminating documents were found and seized/impounded. These incriminating documents are also related to you and transactions appearing therein are done by you.

S.No.	Premises	Related to	Party No.	Annexure
1.	188, Tagor Nagar, Hiran Magri Sector-4, Udaipur	Nirmal Jain Dipesh Jain Jenisha Jain Nirmal Kumar Jain Manju Devi Jain Kartika Jain	Party No. A-1	Exh.1 to 7

Please give your explanation on each and every page of these annexure with supporting evidence (in the following format). Please get verified each and every page of these Annexures from the regular books of accounts maintained by you. Please also give details of entries/amounts (Annexure-wise) which are not verifiable from your regular books of accounts alongwith with the reasons as to why the amount involved in these entries/ annexures should not be considered as your undisclosed income.

Annexure	Page No.	Description	Page belongs to	Amount involved
1	2	3	4	5

Whether declared in return/entered in books of accounts	Supporting evidence	Remarks		
6	7	8		

You are also requested to please explain and prove your various contentions with supporting documentary evidence/books of accounts/returns of income filed by respective persons of family members. Please also get verified the sale/purchases vouchers and transaction appeared in various loose papers and notebooks found and seized from regular books of accounts. All photocopies of the said Annexures and statements are supposed to have been provided/given to you by the ADIT/DDIT(Inv.), Udaipur before filing of returns of income.

If the loose paper/documents/entry appeared therein belongs to any other person then please furnish the name and complete address of such person, the name of his Assessing Officer alongwith his confirmation in the form of affidavit. The person should also be produced for verification. Please also explain why such loose paper/documents etc. was lying in your custody. In this regard your attention is also invited to the provisions of section 292C of the I.T. Act, 1961 which deals with presumption as to assets, books of accounts, money, bullion, jewellery etc. found in the possession or control of any person in the course of a search u/s.132 of the Act, it shall be presumed that the assets, books of accounts, money, bullion, jewellery belongs to such person, if he fails to prove it otherwise. You are therefore; requested to please give your explanation alongwith supporting evidence. In case, you fail to explain the same, please show cause as to why the amount involved should not be treated as unexplained and added in your hands.

13. In respect of land/property transaction appearing in the above annexure as well as pointed out in your statement recorded during the course of search/post search proceedings, please furnish the information in following format:

i. Please furnish the detailed chart in respect of each and every property as mentioned in entire seized material such as :

S.No. / description of property / from whom it was purchased / amount of purchase consideration / registry value / to whom it was sold / amount of sale consideration / registry value / DLC rate of property / remarks.

ii. Please explain as to how these properties have been acquired by you in your name or in your family member's name. Furnish supporting evidences.

iii. Please explain the source of investment in these properties supported by documentary evidence failing which unexplained investment in these assets will be brought to tax in your hand in the relevant assessment year as income from undisclosed sources.

iv. Please give the mode of payment of consideration amount and details of other relating expenses in respect of above mentioned properties be furnished.

v. Please also intimate after purchasing the immovable properties whether new construction/renovation/addition/alteration in existing building/land has been done, if so, please submit complete details thereof, such nature of addition/alteration/renovation/period/amount of investment made and explain the source of investment.

- vi. Please intimate the rental income derived from the properties on their letting out and period from when these are let out and to whom these are let out.
- vii. Please also intimate whether the rental incomes of properties are being shown in return of income filed by you, if so, please produce necessary evidence in this regard.
- viii. Please produce Khasra of agricultural land and give the name of the person who is carrying out farming on your agricultural land. Produce evidence regarding agreement with the farmer, if any, as well as produce evidence regarding agricultural income.
- ix. If any of the above named properties have been resold after purchase, please intimate the same and give full particulars alongwith necessary documentary evidences.
- x. As per available details, the above mentioned properties have been purchased at lower value than the rate stipulated for the area. Please state and explain why it should not be treated as deemed investment.
- xi. If the property belongs to any other person/your family members, please furnish name and address of the person alongwith his confirmation in the form of affidavit. The person should also be produced for verification. Please also explain why the property belonging to the other person is lying in your possession.
- xii. If there is any difference in value determined by the Sub-Registrar and sale/purchase consideration, why necessary addition should not be made in your hands as per relevant provisions of I.T.Act, 1961.
14. Furnish/upload soft copy of relevant books of account as maintained. Also provide soft copy of day to day cash book (with narration).
1. You may submit your reply electronically through 'e-Proceedings' facility.

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR

(In case the document is digitally signed please refer Digital Signature at the bottom of the page)

आयकर अधिनियम, 1961 की धारा 147 के साथ पठित धारा 143(2) के तहत सूचना
Notice under section 143(2) read with section 147 of the Income-tax Act, 1961



PAN: ADJPJ1116G

Name: NIRMAL KUMAR JAIN

Address: 188 TEGORE NAGAR , SEC NO. 4
HIRAN MAGRI
UDAIPUR 313001 , Rajasthan

DIN: ITBA/AST/F/143(2)_4/2023-24/1059545521(1)

Date: 10/01/2024

Assessment Year: 2019-20

Financial Year: 2018-19

आपको यह संचार क्यों मिल रहा है?

Why are you getting this communication?

प्रिय करदाता,

Dear Taxpayer,

आप आयकर अधिनियम, 1961 (अधिनियम) की धारा 148 के तहत 29-03-2023 को डीआईएन ITBA/AST/S/148_1/2022-23/1051615131(1) के माध्यम से जारी किए गए पूर्व नोटिस की निरंतरता में यह संचार प्राप्त कर रहे हैं।

You are receiving this communication in continuation of earlier notice under section 148 of the Income-tax Act, 1961 (Act), issued to you on **29-03-2023** vide DIN **ITBA/AST/S/148_1/2022-23/1051615131(1)**.

2. ऊपर उल्लिखित धारा 148 के तहत नोटिस के जवाब में, आपने 02/01/2024 पर पावती संख्या 129446420280423 के द्वारा आकलन वर्ष 2019-20 के लिए अपनी आय की विवरणी दाखिल की।

2. In response to the notice under section 148 referred to above, you had filed your return of income for the Assessment Year **2019-20** vide Ack. No. **129446420280423** on **02/01/2024**.

3. विवरणिका को तैयार करने में आपकी सावधानी को स्वीकार करते हुए, कुछ मुद्दों पर और स्पष्टीकरण की आवश्यकता है, जिनके कारण आपकी आय विवरणिका को संवीक्षा (जाँच) के लिए चुना गया है।

3. While acknowledging the care you may have taken in preparing the return of income, there are certain issues, on which further clarification is required, therefore, return of income has been selected for scrutiny.

किन मुद्दों पर और स्पष्टीकरण की आवश्यकता है?

What is/are the Issue(s) on which further clarification is required?

As per Annexure

विभाग इन मुद्दों या संवीक्षा कार्यवाही के दौरान पाए जाने वाले किसी अन्य मुद्दे से संबंधित और प्रश्न पूछ सकता है या विस्तृत प्रश्नावली जारी कर सकता है, जिसे संवीक्षा कार्यवाही के दौरान सूचित किया जाएगा।

The Department may raise further queries or issue a detailed questionnaire pertaining to these issues or any other issues found during scrutiny proceedings, which will be intimated during the course of scrutiny proceedings.

आपको क्या करने की आवश्यकता है?

What you need to do?

आप ई-फाइलिंग वेबसाइट (www.incometax.gov.in) में इलेक्ट्रॉनिक रूप से अपने खाते के माध्यम से 'ई-प्रोसीडिंग्स' की सुविधा का उपयोग करके, **17/01/2024** को **12:38 PM** बजे या उससे पहले अपनी सुविधानुसार –

(i) कोई भी साक्ष्य, जिस पर आप अपनी आयकर विवरणी के समर्थन में निर्भर करते हैं।

(ii) उपरोक्त मुद्दे/मुद्दों पर आपका उत्तर।

प्रस्तुत कर सकते हैं या करवा सकते हैं।

You may submit or cause to submit:

- (i) Any evidence on which you may rely in support of your return of income;
(ii) Reply to the above-mentioned issue(s);
electronically in 'e-Proceedings' facility through your account in e-Filing website (www.incometax.gov.in) at your convenience on or before **17/01/2024 at 12:38 PM**.

इसके अलावा, यह सलाह दी जाती है कि आप उपरोक्त संदर्भित मुद्दों से संबंधित सभी जानकारी, दस्तावेज, साक्ष्य आदि एकत्र करें जो जांच की कार्यवाही के लिए प्रासंगिक हो सकते हैं। मूल्यांकन कार्यवाही के दौरान विस्तृत प्रश्नावली या संचार जारी किया जा सकता है। जब भी प्रश्नावली या संचार जारी किया जाता है, तो आपको निर्दिष्ट समय के भीतर विशिष्ट बिंदु-वार प्रतिक्रिया प्रदान करने की आवश्यकता होती है।

Further, it is advised that you should gather all the information, documents, evidences, etc. related to the above referred issues which may be relevant for the scrutiny proceedings. Detailed questionnaire(s) or communication may be issued during the course of assessment proceedings. As and when questionnaire(s) or communication is issued, you are required to provide specific point-wise response within the time specified.

कार्यवाही का तरीका क्या होगा?

What will be the mode of proceedings?

कार्यवाही आपके ई-फाइलिंग वेबसाइट (www.incometax.gov.in) में आपके खाते के माध्यम से 'ई-कार्यवाही' सुविधा में इलेक्ट्रॉनिक रूप से आयोजित की जाएगी। ई-फाइलिंग वेबसाइट (www.incometax.gov.in) पर 'ई-प्रोसीडिंग्स'/'फेसलेस असेसमेंट' पर एक संक्षिप्त नोट उपलब्ध है।

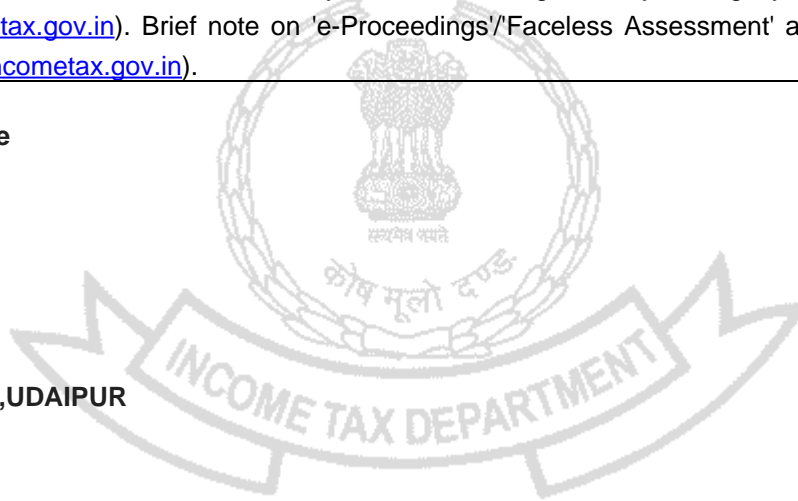
The proceedings will be conducted electronically in 'e-Proceedings' facility through your account in e-Filing website (www.incometax.gov.in). Brief note on 'e-Proceedings'/'Faceless Assessment' are available on the e-Filing website (www.incometax.gov.in).

Enclosure: As Above

With Regards,

Yours faithfully,

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR



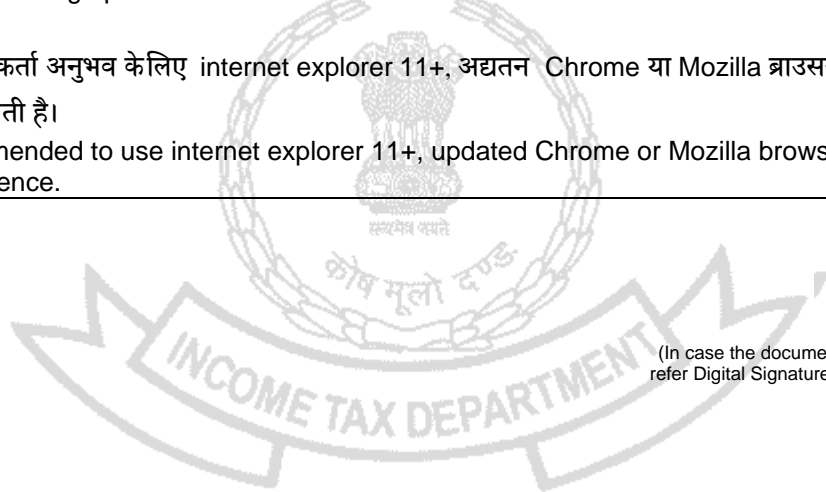
ANNEXURE

Considering the facts that warrant of authorization u/s 132 of the Act was executed and search was initiated on 23.11.2022 in the case of the assessee and considering the provisions of section 148 read with explanation 2(i) alongwith clause (a) of proviso to section 148A of the I.T. Act, 1961, it is evident that there is information with the Assessing Officer which suggests that the income chargeable to tax has escaped assessment in the case of the assessee for the AY 2019-20.

Yours faithfully,
AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR



सहायता कैसे प्राप्त करें? How to Get Assistance?
आप टोल फ्री नंबर 1800 103 4215 पर सभी कार्य दिवसों में प्रातः 9:30 से सांय 6:00 तक सम्पर्क कर सकते हैं। You can also call at Toll Free number 1800 103 4215 from 9:30 a.m. to 6:00 p.m. on all working days.
ध्यान रखने योग्य बातें - Tips to Remember
<ol style="list-style-type: none">1. चूंकि संदेशों में आपके वित्तीय लेन-देन से संबंधित व्यक्तिगत व संवेदनशील जानकारी हो सकती है, अतः आपको आयकर विभाग से सभी संचारों के लिए आपकी व्यक्तिगत/संस्थागत ई-मेल उपयोग करने की दृढ़ता से सलाह दी जाती है। You are strongly advised to use your personal/ organizational e-mail ID for all the communication with us, since the communication may contain your personal and sensitive information related to your financial transactions.2. कृपया प्रेषक की ई मेल को श्वेत सूची या सुरक्षित प्रेषक सूची में जोड़ें अन्यथा आपका मेलबॉक्स फिल्टर आपको इस प्रेषक से ई-मेल पर अद्यतन सूचनाएं प्राप्त करने से रोक सकता है। Please add the sender e-mail to whitelist or safe sender list; else your mailbox filter may stop you from receiving updates over e-mail from this sender.3. बेहतर उपयोगकर्ता अनुभव के लिए internet explorer 11+, अद्यतन Chrome या Mozilla ब्राउसर के उपयोग की संस्तुति की जाती है। It is recommended to use internet explorer 11+, updated Chrome or Mozilla browsers for smooth user experience.



(In case the document is digitally signed please refer Digital Signature at the bottom of the page)

This document is digitally signed

Signer: AJAY AGARWAL
Date: Wednesday, January 10, 2024 12:52 PM
Location: DIRECTORATE, India



GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE INCOME TAX
OFFICER
ITO WD-2(1), UDP

To,
NIRMAL KUMAR JAIN
188 TEGORE NAGAR , SEC NO. 4 HIRAN
MAGRI
UDAIPUR 313001 , Rajasthan
India

PAN: ADJPJ1116G	A.Y: 2019-20	Dated: 29/03/2023	DIN & Notice No: ITBA/AST/S/148_1/2022- 23/1051615131(1)
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Notice under section 148 of the Income-tax Act,1961

Sir/Madam/ M/s.

- I have information that a search was initiated under section 132 of the Act in your case or in the case of the person in respect of which you are the assessable under the Act on the date 23/11/2022.
This notice is being issued after obtaining the prior approval of the **PCIT, Udaipur** accorded on date vide Reference No. **10000038520535**.
- I, therefore, propose to assess or reassess such income or recompute the loss or the depreciation allowance or any other allowance or deduction for the Assessment Year **2019-20** and I, hereby, require you to furnish, within 30 days from the service of this notice, a return in the prescribed form for the Assessment Year **2019-20**.

THUNDATHIL PADMANABHAN SAJEEV
ITO WD-2(1), UDP

(In case the document is digitally signed please refer Digital Signature at the bottom of the page)

Note: If digitally signed, the date of digital signature may be taken as date of document.

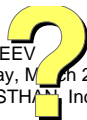
,AAYKAR BHAWAN, UDAIPUR, RAJAST, SUBCITY CENTRE, SAVINA, UDAIPUR, Rajasthan, 313001

Email: UDAIPUR.ITO2.1@INCOMETAX.GOV.IN,

This document is digitally signed

Note:- The website address of the e-filing portal has been changed from www.incometaxindiaefiling.gov.in to www.incometax.gov.in.
* DIN-Documents identification No.

Signer: T P SAJEEV
Date: Wednesday, March 29, 2023 9:24 PM
Location: RAJASTHAN, India





GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT
COMMISSIONER OF INCOME TAX
CENTRAL CIRCLE 2,UDAIPUR

To,
NIRMAL KUMAR JAIN
188 TEGORE NAGAR , SEC NO. 4 HIRAN MAGRI
UDAIPUR 313001 , Rajasthan
India

PAN: ADJPJ1116G	A.Y: 2021-22	Dated: 20/02/2024	DIN & Notice No: ITBA/AST/S/148_1/2023-24/1061227560(1)
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Notice under section 148 of the Income-tax Act,1961

Sir/Madam/ M/s.

- I have information that a search was initiated under section 132 of the Act in your case or in the case of the person in respect of which you are the assessable under the Act on the date 23/11/2022.
This notice is being issued after obtaining the prior approval of the **PCIT (Central), Jaipur** accorded on date vide Reference No. **10000047645967**.
- I, therefore, propose to assess or reassess such income or recompute the loss or the depreciation allowance or any other allowance or deduction for the Assessment Year **2021-22** and I, hereby, require you to furnish, within **90** days from the service of this notice, a return in the prescribed form for the Assessment Year **2021-22**.

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR

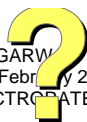
(In case the document is digitally signed please refer Digital Signature at the bottom of the page)

Note: If digitally signed, the date of digital signature may be taken as date of document.
AAVKAR BHAWAN, UDAIPUR, RAJAST, SUBCITY CENTRE, SAVINA, UDAIPUR, Rajasthan. 313001
Email: UDAIPUR.DCIT.CEN2@INCOMETAX.GOV.IN,

Note:- The website address of the e-filing portal has been changed from www.incometaxindiaefiling.gov.in to www.inco
* DIN-Documents identification No.

This document is digitally signed

Signer: AJAY AGARWAL
Date: Tuesday, February 20, 2024 11:00 PM
Location: DIRECTORATE, India



Notice under section 143(2) of the Income-tax Act, 1961



GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT
COMMISSIONER OF INCOME
TAX
CENTRAL CIRCLE 2,UDAIPUR

PAN: ADJPJ1116G

DIN: ITBA/AST/S/143(2)/2023-24/1053898712(1)

Name: NIRMAL KUMAR JAIN

Date: 23/06/2023

Address: 188 TEGORE NAGAR , SEC NO. 4 HIRAN
MAGRI
UDAIPUR 313001 , Rajasthan, India

Assessment Year: 2022-23

Financial Year: 2021-22

क. आपको यह संचार क्यों मिल रहा है?

A. Why are you getting this communication?

प्रिय करदाता,

Dear Taxpayer,

आयकर विभाग आपके द्वारा निर्धारण वर्ष 2022-23 के लिए दिनांक 29/07/2022 को पावती संख्या 251745890290722 के तहत आयकर विवरणी दाखिल करने पर, देश के विकास में आपके योगदान की सराहना करता है।

The Income Tax Department appreciates your contribution towards development of the Nation by filing of your return of income for the Assessment Year 2022-23 vide Ack. no. 251745890290722 on 29/07/2022.

विवरणिका को तैयार करने में आपकी सावधानी को स्वीकार करते हुए, कुछ मुद्दों पर और स्पष्टीकरण की आवश्यकता है, जिनके कारण आपकी आय विवरणिका को आयकर अधिनियम, 1961 के प्रावधानों के अनुसार संवीक्षा मूल्यांकन के लिए चुना गया है।

While acknowledging the care you may have taken in preparing the return of income, there are certain issues, on which further clarification is required. Therefore, the return of income has been selected for scrutiny assessment in accordance with the provisions of the Income-tax Act, 1961.

ख. आपको क्या करने की आवश्यकता है?

B. What you need to do?

आप ई-फाइलिंग वेबसाइट (www.incometax.gov.in) में इलेक्ट्रॉनिक रूप से अपने खाते के माध्यम से 'ई-प्रोसीडिंग्स' की सुविधा का उपयोग करके, अपनी सुविधानुसार कोई भी साक्ष्य, जिस पर आप अपनी आयकर विवरणी के समर्थन में निर्भर करते हैं, दिनांक 10/07/2023 को या उससे पहले प्रस्तुत कर सकते हैं या करवा सकते हैं।

You may submit or cause to submit any evidence on which you may rely in support of your return of income electronically in 'e-Proceedings' facility through your account in e-Filing website (www.incometax.gov.in) at your convenience on or before 10/07/2023.

आपको विचाराधीन निर्धारण वर्ष के दौरान आपके द्वारा किए गये विभिन्न वित्तीय लेन-देन से संबन्धित सारी जानकारियाँ, दस्तावेज, साक्ष्य इत्यादि एकत्र करने की सलाह दी जाती है। विस्तृत प्रश्नावली या संचार, निर्धारण प्रक्रिया के दौरान जारी किया जा सकता है। जब भी आपको प्रश्नावली या संचार जारी किया जाता है, आपको निर्दिष्ट समयावधि में बिन्दुवार प्रतिक्रिया देने की आवश्यकता है।

It is advised that you should gather all the information, documents, evidences, etc. in respect of various financial

transactions you have entered during the Assessment Year under consideration, which may be relevant for the scrutiny proceedings. Detailed questionnaire(s) or communication may be issued during the course of assessment proceedings. As and when questionnaire(s) or communication is issued, you are required to provide specific point-wise response within the time specified.

ग. कार्यवाही का तरीका क्या होगा?

C. What will be the mode of proceedings?

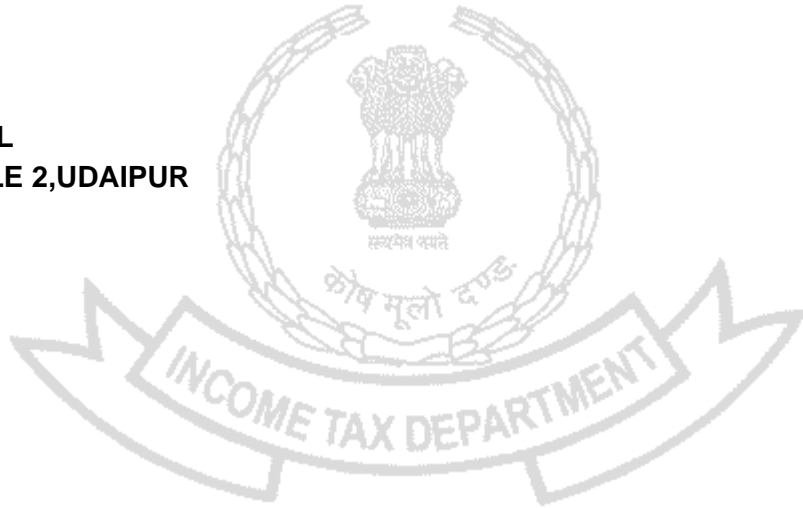
कार्यवाही आपके ई-फाइलिंग वेबसाइट (www.incometax.gov.in) में खाते के माध्यम से 'ई-प्रोसीडिंग्स' सुविधा के द्वारा इलेक्ट्रॉनिक रूप से की जाएगी। 'ई-प्रोसीडिंग्स'/'पहचान विहीन निर्धारण' पर एक संक्षिप्त टिप्पणी ई-फाइलिंग वेबसाइट (www.incometax.gov.in) पर उपलब्ध है।

The proceedings will be conducted electronically in 'e-Proceedings' facility through your account in e-Filing website (www.incometax.gov.in). Brief note on 'e-Proceedings'/'Faceless Assessment' are available on the e-Filing website (www.incometax.gov.in).

With Regards,

Yours faithfully,

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR



घ. सहायता कैसे प्राप्त करें?

D. How to Get Assistance?

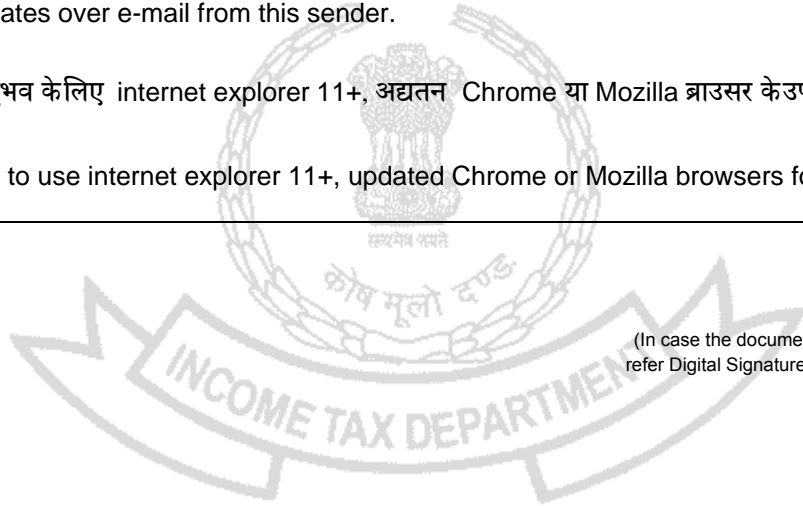
आप टोल फ्री नंबर **1800 103 4215** पर सभी कार्य दिवसों में प्रातः 9:30 से सांय 6:00 तक सम्पर्क कर सकते हैं।

You can also call at Toll Free number **1800 103 4215** from 9:30 a.m. to 6:00 p.m. on all working days.

ड. ध्यान रखने योग्य बातें -

E. Tips to Remember

1. चूंकि संदेशों में आपके वित्तीय लेन-देन से संबन्धित व्यक्तिगत व संवेदनशील जानकारी हो सकती है, अतः आपको आयकर विभाग से सभी संचारों के लिए आपकी व्यक्तिगत/संस्थागत ई-मेल उपयोग करने की दृढ़ता से सलाह दी जाती है।
You are strongly advised to use your personal/ organizational e-mail ID for all the communication with us, since the communication may contain your personal and sensitive information related to your financial transactions.
2. कृपया प्रेषक की ई मेल को श्वेत सूची या सुरक्षित प्रेषक सूची में जोड़ें अन्यथा आपका मेलबॉक्स फिल्टर आपको इस प्रेषक से ई-मेल पर अद्यतन सूचनाएं प्राप्त करने से रोक सकता है।
Please add the sender e-mail to whitelist or safe sender list; else your mailbox filter may stop you from receiving updates over e-mail from this sender.
3. बेहतर उपयोगकर्ता अनुभव के लिए internet explorer 11+, अद्यतन Chrome या Mozilla ब्राउसर के उपयोग की संस्तुति की जाती है।
It is recommended to use internet explorer 11+, updated Chrome or Mozilla browsers for smooth user experience.



(In case the document is digitally signed please refer Digital Signature at the bottom of the page)

This document is digitally signed

Signer: AJAY AGARWAL
Date: Friday, June 21, 2023 11:56 AM
Location: DIRECTORATE, India



GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT COMMISSIONER
OF INCOME TAX
CENTRAL CIRCLE 2,UDAIPUR

To,
NIRMAL KUMAR JAIN
188 TEGORE NAGAR, SEC NO. 4 HIRAN MAGRI
UDAIPUR 313001, Rajasthan
India

PAN: ADJPJ1116G	AY: 2022-23	Dated: 20/07/2023	DIN & Notice No : ITBA/AST/F/142(1)/2023-24/1054466630(1)
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आयकर अधिनियम, 1961 की धारा 142 की उप-धारा (1) के तहत सूचना
Notice under sub-section (1) of Section 142 of the Income Tax Act, 1961

महोदय/महोदया/मैसर्स
Sir/ Madam/ M/s,

निर्धारण वर्ष 2022-23 के लिए निर्धारण के संबंध में, आपको निम्न करने की आवश्यकता है:
In connection with the assessment for the assessment year 2022-23, you are required to:

- क) 31/07/2023 11:15 AM को या उससे पहले अनुलग्नक के अनुसार मांगे गए खातों और दस्तावेजों को प्रस्तुत करें, अथवा प्रस्तुत कराएं। या
- a) Produce, or cause to be produced, the accounts and documents called for as per annexure on or before 31/07/2023 11:15 AM or
- ख) अनुलग्नक के अनुसार और उसमें निर्दिष्ट बिंदुओं या मामलों पर मांगी गई जानकारी जो कि आयकर नियम, 1962 के नियम 14 के तहत निर्धारित तरीके से सत्यापित हो 31/07/2023 11:15 AM को या उससे पहले प्रस्तुत करें।
- b) Furnish the information called for as per annexure and on the points or matters specified therein and verified in the prescribed manner under Rule 14 of Income-tax Rules, 1962 on or before 31/07/2023 11:15 AM.
- ग) उपरोक्त साक्ष्य/सूचना आयकर विभाग की 'ई-फाइलिंग' वेबसाइट (www.incometax.gov.in) में आपके खाते के माध्यम से 'ई-प्रोसीडिंग्स' सुविधा में इलेक्ट्रॉनिक रूप से प्रस्तुत की जानी है। ई-फाइलिंग वेबसाइट (www.incometax.gov.in) पर 'ई-प्रोसीडिंग्स'/'पहचान विहीन निर्धारण' पर संक्षिप्त नोट उपलब्ध हैं।
- c) The above-mentioned evidence/information is to be furnished electronically in 'e-Proceedings' facility through your account in 'e-Filing' website of Income Tax Department (www.incometax.gov.in). Brief note

Note: If digitally signed, the date of digital signature may be taken as date of document.
,AAYKAR BHAWAN, UDAIPUR, RAJAST, SUBCITY CENTRE, SAVINA, UDAIPUR, Rajasthan, 313001
Email: UDAIPUR.DCIT.CEN2@INCOMETAX.GOV.IN,

Note:- The website address of the e-filing portal has been changed from www.incometaxindiaefiling.gov.in to www.incometax.gov.in.

* DIN- Document identification No.

on 'e-Proceedings'/'Faceless Assessment' are available on the e-Filing website (www.incometax.gov.in).

Yours faithfully,

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR



अनुलग्नक ANNEXURE

1. आयकर अधिनियम, 1961 की धारा 142(1) के तहत निम्नलिखित खाते या दस्तावेज या जानकारी मांगी गई है:
1. **The following accounts or documents or information is/are sought under section 142(1) of the Income-tax Act, 1961:**

You have filed return of income for A.Y. 2022-23 vide acknowledgement No. 251745890290722 on 29.07.2022. The same has been selected for compulsory scrutiny by issuing notice u/s. 143(2) as per CBDT guidelines for Compulsory selection of returns for complete scrutiny during F.Y. 2023-24. There are certain issues, on which further clarification is required. You are therefore, requested to provide information/explain specific points as mentioned below with relevant documentary evidences:

1. Please provide brief note on the source of income and detail of business activities carried out during the year and method of accounting followed during the A.Y. 2022-23. In case of deviation in method of accounting, please mention and give a note on it.
2. Please provide complete set of following:-
 - a. Furnish complete return of income filed alongwith computation of total income, income and expenditure account, Audit report, Balance Sheet, Profit & Loss A/c, Manufacturing/Trading a/c with schedules/annexures for the A.Y. 2022-23.
 - b. Furnish salary certificate alongwith nature of duties performed by you.
 - c. Complete details of long term capital gain declared in return with all relevant documentary evidences. Furnish copy of demat account for last three years be furnished.
 - d. Proof of income from other sources. Also explain the sources of investment for deriving such income with evidences and complete details. Please give complete details of professional fee received at Rs. 8 Lacs alongwith complete details of such transaction with evidences.
 - e. Proof of deduction claimed under chapter-VI. Also explain the source of investments thereof.
 - f. Quantum and nature of income, if any, claimed as exempt during the relevant previous year.
 - g. If you have held listed/unlisted shares for last three years, please furnish complete details thereof alongwith sources of investment. If the shares were sold in these years, please state whether you have declared profit/gain in the year of sell or not? If yes, give proof. If not, please explain necessary action as per the Act should not be taken in your hands? Furnish copy of demat account for last three years be furnished.
 - h. Sources of investment in assets and liability (schedule-AL of ITR) be explained with relevant documentary evidences.
 - i. Provide the comparison of income reported, deductions/exemptions/rebate claimed, current year/carried forwarded loss set-off/adjusted, advance tax paid, self-assessment tax paid, TDS deducted, total tax paid, refund claimed for the current year under consideration and previous two years.
 - j. Please furnish latest/updated Form 26AS of the year under consideration. Please reconcile the

gross receipts as per Form 26AS with your turnover/receipts shown as per your books of accounts/return of income, if any.

k. Whether you have revised the ITR for AY under consideration. If yes, please provide the details of changes made by you in the revised return in comparison to the original ITR filed for the year under consideration.

l. Please furnish details of exempt income with evidences of claim of exempt income, if any. Whether any expenses have been claimed in respect of any exempt income. If yes then submit the complete details of same.

m. Please also state your indulgence in any other business or please state are you also a director/partner in any other company/firm? If yes, please give complete details thereof alongwith income earned therefrom. Furnish copy of your account in the said firm/company.

n. Whether you have declared any undisclosed income or offered any income. If yes, furnish its complete detail alongwith detail of its generation and accumulation. Please also explain as to why penalty as per the Income-tax Act should not be initiated for disclosure of undisclosed income in the return.

o. Please state whether you have made payment in violation to provision of section 40A(3), 40(a)(ia), 43B, 69C, 269SS, 269T and 269ST etc. If yes, please show cause as to why necessary action as per the Income tax Act should not be taken.

p. Complete details of interest paid and received alongwith its rate.

q. Furnish head-wise TDS ledger with return of TDS (if any).

r. Furnish return of GST (if any).

3. Provide details of all bank accounts held (including the accounts closed during the year). Also furnish complete account statement with explanation regarding credit and debit entries appearing therein:

Name of the bank and branch	Account Number	Type of Account (SB/CA/OD/FD/others)	Interest accrued or received for the A.Y. 2022-23	Held in the name of / belongs to

It is relevant to mention here that during the course of search proceedings, following bank accounts were noticed as maintained by you:

S.no	Name of the A/c holder	A/c Number	Name of the Bank	Branch Address
1	Nirmal Kumar	050104000159180	IDBI Bank Ltd	16,Mumal towers saheli marg , Udaipur

S.no	Name of the A/c holder	A/c Number	Name of the Bank	Branch Address
	Jain			
		050653700000912	IDBI Bank Ltd	16,Mumal towers saheli marg , Udaipur
		668025110000013	Bank of India	3,karjali bhavan, nyay marg,Udaipur,Rajasthan-313001
		668062610000074	Bank of India	
		668010110006840	Bank of India	
		11347276327	RMGB	

Please furnish complete account statements for the period under consideration explaining credit and debit entries appearing in the said statement.

4. List of sundry creditors with name, address, PAN, credit balance, if applicable.
5. Furnish details of unsecured loans/deposits taken during the year including squared up loan.
6. Give details of the loans, advances and deposits given, including the accounts squared up during the year.
7. Whether you have made any expenditure on any social ceremony like marriage, birthday, religious trip etc. during the year under consideration, if so, give complete details thereof.
8. Regarding all the fixed assets added during the year, submit the following information:-

S.N.	Name, full address of supplier	Bill No. and date	Bill amount + Sales Tax/GST & Excise charged on bill	Date and mode of payment cash / bank a/c cheque No. a/c no. and bank branch	Any other cost such as transportation, interest etc. added into the actual cost.

9. Please furnish complete details of addition/deletion of movable and immovable property during the year with all relevant documentary evidence. Sources of investment be explained with evidences. Please explain the sources of investment/purchase of properties with relevant evidences. Please also furnish copy of registry for verification. Please also give complete details regarding construction

activities done on the above properties with sources of construction expenses.

10. Complete details of household expenses alongwith contribution made by family members.

11. During search proceedings, it is gathered that you are having following immovable properties:

SR. NO.	PLOT NO.	AREA(SQ.FIT)	PLACE	ARAJAI NO.	DATE	REGISTRY/PATTA
1	8	3200	BALICHA	181, 182,188 TO 190	2/25/2005	PATTA
2	3	6600	DEWALI	678 679	12/31/2003	PATTA
3	4	5280	DEWALI	678 679	7/20/2012	REGISTRY
4	51	3064.3	DEWALI	1153/659	9/29/2014	REGISTRY
5	14	1500	NELA	1797	3/16/2006	PATTA
6	15	1500	NELA	1797	3/16/2006	PATTA
7	37	2039.3	NELA	1797	3/16/2006	PATTA
8	AGRICULTURE	1 batta 28		4074/4230/294	5/22/2008	REGISTRY
9	4	1920	MADRI PANERIO	1700 1703	12/3/2005	PATTA
10	172/173/176	8487	DEWALI	151, 155 -164		
11	174	2346	DEWALI	151, 155 -164		
12	175	2346	DEWALI	151, 155 -164		
13	2,3	9120	SAVINA KHEDA	858, 859,863-870		PATTA

SR. NO.	PLOT NO.	AREA(SQ.FIT)	PLACE	ARAJAI NO.	DATE	REGISTRY/PATTA
14	4	2479	MANVA KHEDA			
15	11	1050	MANVA KHEDA			
16	164	2100	DEWALI 713		10/20/2003	PATTA
17	34	2400 SQ.FIT.	SHANTI NAGER LODHA HOUSE SEC.3			
18	AGRICULTURE	1.5 BIGA	BHANSOL MAVLI		08.05.2019	
19	AGRICULTURE	1 BIGHA	DIWALI		9/23/2013	
20	188	2400 SQ.FIT	REGI. HOUSE TAGORE NAGER SEC.4		1997	

Please explain the sources of investment/purchase of above properties with relevant evidences. Please also furnish copy of registry for verification. Please also give complete details regarding construction activities done on the above properties with sources of construction expenses. If there is any difference in value determined by the Sub-Registrar and sale/purchase consideration, necessary addition should not be made in your hands as per relevant provisions of I.T. Act, 1961.

12. You belong to Akme and Ankur Group, Udaipur where search and survey operations were carried out simultaneously on 23.11.2022 including premises pertains to you. During the course of search, following incriminating documents were found and seized/impounded. These incriminating documents are also related to you and transactions appearing therein are done by you.

S.No.	Premises	Related to	Party No.	Annexure
1.	188, Tagor Nagar, Hiran Magri Sector-4, Udaipur	Nirmal Jain	Party No. A-1	Exh.1 to 7

		Dipesh Jain Jenisha Jain Nirmal Kumar Jain Manju Devi Jain Kartika Jain		
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Please give your explanation on each and every page of these annexure with supporting evidence (in the following format). Please get verified each and every page of these Annexures from the regular books of accounts maintained by you. Please also give details of entries/amounts (Annexure-wise) which are not verifiable from your regular books of accounts alongwith with the reasons as to why the amount involved in these entries/ annexures should not be considered as your undisclosed income.

Annexure	Page No.	Description	Page belongs to	Amount involved
1	2	3	4	5
Whether declared in return/entered in books of accounts	Supporting evidence	Remarks		
6	7	8		

You are also requested to please explain and prove your various contentions with supporting documentary evidence/books of accounts/returns of income filed by respective persons of family members. Please also get verified the sale/purchases vouchers and transaction appeared in various loose papers and notebooks found and seized from regular books of accounts. All photocopies of the said Annexures and statements are supposed have been provided/given to you by the ADIT/DDIT(Inv.), Udaipur before filing of returns of income.

If the loose paper/documents/entry appeared therein belongs to any other person then please furnish the name and complete address of such person, the name of his Assessing Officer alongwith his confirmation in the form of affidavit. The person should also be produced for verification. Please also explain why such loose paper/documents etc. was lying in your custody. In this regard your attention is also invited to the provisions of section 292C of the I.T. Act, 1961 which deals with presumption as to assets, books of accounts, money, bullion, jewellery etc. found in the possession or control of any person in the course of a search u/s.132 of the Act, it shall be presumed that the assets, books of accounts, money, bullion, jewellery belongs to such person, if he fails to prove it otherwise. You are, therefore, requested to please give your explanation alongwith supporting evidence. In case, you fail to explain the same, please show cause as to why the amount involved should not be treated as unexplained and added in your hands.

13. In respect of land/property transaction appearing in the above annexure as well as pointed out in your statement recorded during the course of search/post search proceedings, please furnish the information in following format:

i. Please furnish the detailed chart in respect of each and every property as mentioned in entire seized material such as:

S.No. / description of property / from whom it was purchased / amount of purchase consideration / registry value / to whom it was sold / amount of sale consideration / registry value / DLC rate of property / remarks.

ii. Please explain as to how these properties have been acquired by you in your name or in your family member's name. Furnish supporting evidences.

iii. Please explain the source of investment in these properties supported by documentary evidence failing which unexplained investment in these assets will be brought to tax in your hand in the relevant assessment year as income from undisclosed sources.

iv. Please give the mode of payment of consideration amount and details of other relating expenses in respect of above mentioned properties be furnished.

v. Please also intimate after purchasing the immovable properties whether new construction/renovation/addition/alteration in existing building/land has been done, if so, please submit complete details thereof, such nature of addition/alteration/renovation/period/amount of investment made and explain the source of investment.

vi. Please intimate the rental income derived from the properties on their letting out and period from when these are let out and to whom these are let out.

vii. Please also intimate whether the rental incomes of properties are being shown in return of income filed by you, if so, please produce necessary evidence in this regard.

viii. Please produce Khasra of agricultural land and give the name of the person who is carrying out farming on your agricultural land. Produce evidence regarding agreement with the farmer, if any, as well as produce evidence regarding agricultural income.

ix. If any of the above named properties have been resold after purchase, please intimate the same and give full particulars alongwith necessary documentary evidences.

x. As per available details, the above mentioned properties have been purchased at lower value than the rate stipulated for the area. Please state and explain why it should not be treated as deemed investment.

xi. If the property belongs to any other person/your family members, please furnish name and address of the person alongwith his confirmation in the form of affidavit. The person should also be produced for verification. Please also explain why the property belonging to the other person is lying in your possession.

xii. If there is any difference in value determined by the Sub-Registrar and sale/purchase consideration, necessary addition should not be made in your hands as per relevant provisions of I.T. Act, 1961.

14. Furnish/upload soft copy of relevant books of account as maintained. Also provide soft copy of day to day cash book (with narration).
15. You may submit your reply electronically through 'e-Proceedings' facility.

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR



(In case the document is digitally signed please refer Digital Signature at the bottom of the page)



GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT
COMMISSIONER OF INCOME TAX
CENTRAL CIRCLE 2,UDAIPUR

To,
NIRMAL KUMAR JAIN
188 TEGORE NAGAR , SEC NO. 4 HIRAN MAGRI
UDAIPUR 313001 , Rajasthan
India

PAN: ADJPJ1116G	A.Y: 2020-21	Dated: 20/02/2024	DIN & Notice No: ITBA/AST/S/148_1/2023-24/1061227565(1)
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Notice under section 148 of the Income-tax Act,1961

Sir/Madam/ M/s.

- I have information that a search was initiated under section 132 of the Act in your case or in the case of the person in respect of which you are the assessable under the Act on the date 23/11/2022.
This notice is being issued after obtaining the prior approval of the **PCIT (Central), Jaipur** accorded on date vide Reference No. **10000047645877**.
- I, therefore, propose to assess or reassess such income or recompute the loss or the depreciation allowance or any other allowance or deduction for the Assessment Year **2020-21** and I, hereby, require you to furnish, within **90** days from the service of this notice, a return in the prescribed form for the Assessment Year **2020-21**.

AJAY AGARWAL
CENTRAL CIRCLE 2,UDAIPUR

(In case the document is digitally signed please refer Digital Signature at the bottom of the page)

Note: If digitally signed, the date of digital signature may be taken as date of document.

,AAYKAR BHAWAN, UDAIPUR, RAJAST, SUBCITY CENTRE, SAVINA, UDAIPUR, Rajasthan. 313001

Email: UDAIPUR.DCIT.CEN2@INCOMETAX.GOV.IN,

Note:- The website address of the e-filing portal has been changed from www.incometaxindiaefiling.gov.in to www.inco
* DIN-Documents identification No.

This document is digitally signed

Signer: AJAY AGARWAL
Date: Tuesday, February 20, 2024 11:00 PM
Location: DIRECTORATE, India





GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT DIRECTOR OF
INCOME TAX, INVESTIGATION
DDIT/ADIT(Inv.),2,Udaipur

To,
AKME FINTRADE INDIA LIMITED
4-5,SUBCITY CENTRE,SAVINA, UDAIPUR,
Rajasthan India 313001

PAN:
AABCA2962P

Assessment Year:

DIN & Notice No : 396
ITBA/INV/S/131/2022-23/1048390500(1)

Dated:
02/01/2023

Sir/Madam

Sub: SUMMONS TO ASSESSEE/ WITNESS UNDER SECTION 131(1A) OF THE INCOME TAX ACT, 1961.

Whereas your attendance is required in connection with the proceedings under the Income Tax Act, 1961 in your case.

You are hereby required to attend my office at camp office--Room No.102B, First Floor, Income Tax office, Reti Stand, Savina, Udaipur, on 06/01/2023 at 01:10 PM, to give evidence and / or to produce either personally or through an authorized representative the books of account or other documents specified below and not to depart until you receive my permission to do so.

Without prejudice the provisions of any other law for the time being in force, if you intentionally omit to so attend and give evidence or produce the books of account or documents, a penalty of Rs. 10,000/- (Ten thousand only) may be imposed upon you under section 272A(1)(c) of the Income Tax Act, 1961 for each such default or failure.



Kalpesh Raghavbhai
02/01/23
KALPESH RAGHAVBHAI
KAVAD
DDIT/ADIT(Inv.),2,Udaipur

Books of Accounts or documents to be produced

Note: If digitally signed, the date of digital signature may be taken as date of document.
AAYKAR BHAWAN, UDAIPUR, RAJAST, SUBCITY CENTRE, SAVINA, UDAIPUR, Rajasthan, 313001
Email: UDAIPUR.DDIT.INV2@INCOMETAX.GOV.IN.

The website address of the e-filing portal has been changed from www.incometaxindiafiling.gov.in to www.incometax.gov.in.
Document identification No.

Handwritten notes at the bottom of the page, including "2000", "1000", and "made" written vertically.

1. Provide details of shareholders as on end of each financial year stating from 01.04.2012 in the case of Akme Fintrade India Limited.

S.N.	Full Name	PAN	Address	No. of Shares held

2. Provide details of shares issued by M/s Akme Fintrade India Limited from F.Y 2012-13 onwards till date, years wise in the following format, along with share's valuation certificate.

S.N.	Name	PAN	Address	No. of shares issued	face value	premium	date of issuance

3. Please also provide details of any buybacks of shares, Splitting of Shares, bonus Shares issued and shares transfers list by M/s Akme Fintrade India Limited stating from F.Y 2012-13 till date.



Kalpesh
02/01/23

KALPESH RAGHAVBHAI KAVAD
DDIT/ADIT(Inv.),2,Udaipur

001 / 2 / 2023



GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT DIRECTOR OF
INCOME TAX, INVESTIGATION
DDIT/ADIT(Inv.),2,Udaipur

To, AKME FINTRADE INDIA LIMITED 4-5,SUBCITY CENTRE,SAVINA, UDAIPUR, Rajasthan India 313001	
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PAN: AABCA2962P	Assessment Year:	DIN & Notice No : 413 ITBA/INV/S/131/2022-23/1048476532(1)	Dated: 05/01/2023
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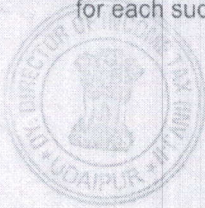
Sir/Madam

Sub: SUMMONS TO ASSESSEE/ WITNESS UNDER SECTION 131(1A) OF THE INCOME TAX ACT, 1961.

Whereas your attendance is required in connection with the proceedings under the Income Tax Act, 1961 in your case.

You are hereby required to attend my office **at camp office--Room No.102B, First Floor, Income Tax office, Reti Stand, Savina, Udiapur, on 09/01/2023 at 11:50 AM**, to give evidence and / or to produce either personally or through an authorized representative the books of account or other documents specified below and not to depart until you receive my permission to do so.

Without prejudice the provisions of any other law for the time being in force, if you intentionally omit to so attend and give evidence or produce the books of account or documents, a penalty of Rs. 10,000/- (Ten thousand only) may be imposed upon you under section 272A(1)(c) of the Income Tax Act,1961 for each such default or failure.



Kalpesh Raghavbhai
05/01/23
KALPESH RAGHAVBHAI
KAVAD
DDIT/ADIT(Inv.),2,Udaipur

Books of Accounts or documents to be produced

Please refer to summon dated 02.01.2023 vide with certain details were sought. In addition to that, please also furnish following details.

1. Provide Fixed Deposits ledger of M/s Akme Fintrade Inida Ltd.
2. Provide details of all Fixed Deposits (FD) accepted and repaid by the company in the following format.

S.No.	FD Holder's Name	FD Holder's PAN	FD Holder's Address	FD Amount	FD Taking Date	Whether FD has been repaid(Yes/No)	If FD is Repaid, the date on which repayment is made

3. Provide details of all bank accounts and details of all movable/immovable assets

Kalpesh
05/01/23

KALPESH RAGHAVBHAI KAVAD
DDIT/ADIT(Inv.),2,Udaipur

3149
29

संलग्नक..... JS पृष्ठ 1
तलाशी की तारीख 23/11/2022

प्राप्त/जब्त जवाहरात आदि की सूची/फेहरिस्त
List Inventory of Jewellery etc. Found/Seized

वैसर्स/श्री/श्रीमती Nirmal Jain, Dipesh Jain, Jenisha Jain

के मामले में J-27(locker no.), TDBI Bank, Udaipur (स्थान का नाम) से प्राप्त/जब्त/बुलियन

प्राथमिक सोना, चाँदी आदि सोने के आभूषण तथा जवाहरात चाँदी की वस्तुओं की सूची :-

प्राप्ति का विशिष्ट स्थान Locker No. J-27, TDBI Bank, Udaipur

उपरोक्त वस्तुओं के दावेदार Nirmal Kumar Jain, Manju Devi, Dipesh Jain, Kartika Jain, Jenisha Jain

क्र.सं. S. No.	वस्तुओं का विवरण Description of the articles	धातु Metal	सकल वजन Gross Wt.	शुद्धता Purity	आंकलित शुद्ध वजन Estimated Net. Wt.	मूल्य रुपये Value in Rs.
①	Jewellery at Sr. No. 1, 3, 4, 6, 7, 8, 9 and 11 as per Annexure JF-2.				1335 gram.	Rs. 65,18,275.37/-
	Seized jewellery is being kept in rectangular box having three (03) seals.					
	Total.				1335 gram	Rs. 65,18,275.37/-
					कुल योग	

पंखों के हस्ताक्षर

1.

2.

प्राधिकृत अधिकारी के हस्ताक्षर व मुहर

Income Tax Officer

Ward 1(1)(2), ReAC, Bikaner

पार्टी के हस्ताक्षर

प्राप्त/जब्त जवाहरात आदि की सूची/फेहरिस्त
List Inventory of Jewellery etc. Found/Seized

वैसर्स/श्री/श्रीमती Nirmal Kumar Jain, Dipesh Jain, Jenisha Jain

के मामले में 188, Tagore Nagar, Sec-4, Udaipur (स्थान का नाम) से प्राप्त/जब्त/बुलियन
प्राथमिक सोना, चाँदी आदि सोने के आभूषण तथा जवाहरात चाँदी की वस्तुओं की सूची :-
188, Tagore Nagar, Sec-4, Udaipur, Locker No J-27, IDBI Bank, Udaipur

प्राप्ति का विशिष्ट स्थान 188, Tagore Nagar, Sec-4, Udaipur, Locker No J-27, IDBI Bank, Udaipur

उपरोक्त वस्तुओं के दावेदार Nirmal Kumar Jain, Manju Devi, Dipesh Jain, Kartika Jain and Jenisha Jain

क्र.सं. S. No.	वस्तुओं का विवरण Description of the articles	धातु Metal	सकल वजन Gross Wt.	शुद्धता Purity Net weight	आंकलित शुद्ध वजन Estimated Net. Wt.	मूल्य रुपये Value in Rs.
	Jewellery found at House-188, Tagore Nagar, Sec-4, Udaipur					
①	As per Ann. JF 1. Sr. No 1 to 5.		422.800 gram	382 gram	-	Rs. 20,05,500/-
	Jewellery found at locker No J-27, IDBI Bank, Udaipur					
②	As per Annexure JF2 Sr. No 1 to 12		3023.200 gram	2668.00 gram	-	Rs. 1,28,86,440/-
	No jewellery/valuables found in locker No. C-14, IDBI Bank.					
			3446 gram	3050 gram		Rs. 1,48,91,940/-
					कुल योग	

पंचों के हस्ताक्षर

1.

2.

Ranjana Mishra

प्राधिकृत अधिकारी के हस्ताक्षर व मुहर

Ward I(1)(2), ReAC, Bikaner

पार्टी के हस्ताक्षर

**ORDER UNDER SECTION 132 (3)
OF THE INCOME TAX ACT, 1961**

By virtue of the powers vested in me under the Warrant of Authorisation dated 22/11/2022 issued by the Sh. S. S. Jha /Principal Director of Income Tax (Investigation)/~~Additional/Joint Director of Income Tax (Investigation)~~, Jaipur Rajasthan under section 132 (1) of the Income-tax Act, 1961 and in exercise of the authority conferred on me by section 132(3) of the Income-tax Act, 1961.

I hereby order you not to remove, part with or otherwise deal with the articles mentioned below without my previous permission:

Details of Articles:-

1. Almirah in the North-West corner room at the ground floor.
2. of House of Sh. Nirmal Kr. Jain, 188, Tagore Nagar, Sector-04,
3. Udaipur.
- 4.
- 5.
- 6.
- 7.
- 8.
- 9.
- 10.

Date 27/11/2022 Seal

Copy to:

1. [Signature]
2. [Signature]
27/11/22

[Handwritten Signature]
27/11/22

Signature and Stamp of the Authorised Officer

[Signature]
Rampal Choudhary
Income Tax Officer
Ward 1(1)(2), ReAC, Bikaner

संलग्नक... CF पृष्ठ 01

तलाशी / सर्वेक्षण की तारीख ... 23.11.2022

प्राप्त/जब्त नकदी की सूची
Inventory of Cash Found/Seized

मैसर्स/श्री/श्रीमती निर्मल कुमार जैन

के मामले में तलाशी/सर्वेक्षण के दौरान 188, टेगोर नगर, सेक्टर-4, इंदौर (स्थान का नाम)

से प्राप्त/जब्त नकदी का विवरण :-

क्र.सं. S. No.	अंकित मूल्य Denomination	बंडलों की संख्या No. of Bundle	नगों की संख्या No. of Pieces	राशि रुपये में Amount in Rs.		
01.	500	-	174	87	00	0
2.	2000	-	10	20	00	0
3.	200	-	37	74	00	0
4.	100	-	101	101	00	0
कुल योग				124	500	0

Read 124000/-
Gupta / Red Book
25.11.22

पंचों के हस्ताक्षर
(केवल तलाशी के मामले में)

तलाशी/सर्वेक्षण के लिए
प्राधिकृत अधिकारी के हस्ताक्षर
(नाम एवं पद सहित)
Rampal Choudhary

पार्टी के हस्ताक्षर
(नाम एवं हैसियत सहित)

संलग्नक. AS पृष्ठ 01
 तलाशी / सर्वेक्षण की तारीख 23.11.2022

प्राप्त/जब्त लेखा बहियों आदि की सूची/फेहरिस्त
 List Inventory of A/C Book etc., Found/Seized

मैसर्स/श्री/श्रीमती Nirmal Kumar Jain, Dipesh Jain, Janisha Jain
 के मामले में 188, Tagore Nagar, Sec-4, Udaipur (स्थान का नाम) से प्राप्त/जब्त/लेखा/बहियों
 दस्तावेजों आदि की सूची :-

क्र.सं. S. No.	विवरण Description	कुल पृष्ठ Total Pages	अवधि/Period		पृष्ठ जिन पर पहचान चिन्ह लगाये गये Pages on which Identification marks placed
			से/ From	तक/ To	
01	Loose papers (Exhibit-01)	110			Cover Page
02	Loose papers (Exhibit-02)	118			- do -
03	Loose papers (Exhibit-03)	143			- do -
04	Loose papers (Exhibit-04)	76			- do -
05	Loose papers (Exhibit-05)	27			- do -
06	Loose papers (Exhibit-06)	100			- do -
07	Loose papers (Exhibit-07)	14			- do -
08	Toshiba Hard disc of 1 Terrabite (With Working copy) Two Harddisks One master, One working copy	—			On the Cover
			कुल योग		

पंचों के हस्ताक्षर
 (केवल तलाशी के मामले में)

तलाशी/सर्वेक्षण के लिए
 प्राधिकृत अधिकारी के हस्ताक्षर

पार्टी के हस्ताक्षर
 (नाम एवं हैसियत सहित)

Rights of the persons to be searched

तलाशी किए जा रहे व्यक्तियों के अधिकार

1. To see the warrant of authorisation duly signed and sealed by the issuing authority.
2. To verify the identity of each member of the search party.
3. To have at least two respectable and independent residents of the locality as witnesses.
4. To have personal search of all members of the party before the start of the search and after conclusion the search.
5. To insist on a personal search of females by another female only with strict regard to decency.
6. To have a copy of the panchanama together with all the annexures.
7. To put his own seals on the packages containing the seized assets.
8. Woman having the occupancy of any apartment etc. to be searched has right to withdraw before the search party enters, if according to the customs, she does not appear in public.
9. To call medical practitioner if he is not well.
10. To have his children permitted to go to school, after the search of their bags.
11. To inspect the seals placed on various receptacles sealed in course of earlier search and subsequently reopened for continuation of search.
12. To have the facility of having meals etc. at the normal time.
13. To have a copy of any statement before it is used against him in an assessment or prosecution proceeding.
14. To have inspection of the books of accounts etc. seized or to take extracts therefrom in the presence of any of the authorised officers or any other person empowered by him.

I have read the above rights and understood them/मैंने उपर्युक्त अधिकारों को पढ़ लिया है। स्थानीय भाषा में मुझे सर्च टीम के प्राधिकृत अधिकारी ने समझा दिया है।

Party's signature

Date:

Time:

Witness: 1

Witness: 2

Countersigned

Duties of the person Searched

1. To allow free unhindered ingress in to the premises.
2. To see the warrant of authorisation and put signature on the same.
3. To identify all receptacles in which assets or books of account and documents are kept and to hand over keys to such receptacles to the authorisation officer.
4. To identify and explain the ownership of the assets, books of account and documents found in the premises.
5. To identify every individual in the premises and to explain their relationship to the person being searched he should not mislead by personating. If he cheats by pretending to be some other person or knowingly substitutes one person for another. It is an offence punishable under section 416 of the Indian Penal Code.
6. Not to allow or encourage the entry of any unauthorised person into the premises.
7. Not to remove any article from its place without notice or knowledge of the authorised officer. If he secretes or destroys any document with the intention of preventing the same from being produced or used as evidence before the court or public servant, he shall be punishable with imprisonment or fine or both, in accordance with section, 204 of the Indian Penal Code.
8. To answer all queries truthfully and to the best of his knowledge. He should not allow any third party to either interfere or prompt while his statement is being recorded by the authorised officer. In doing so, he should keep in mind that :—
 - (i) If he refuses to answer a question on a subject relevant to the search operation, he shall be punishable with imprisonment or fine or both, under section 179 of the Indian Penal Code.
 - (ii) Being legally bound by an oath or affirmation to state the truth, if he makes a false statement. He shall be punishable with imprisonment or fine or both under section 181 of the Indian Penal Code.
 - (iii) Similarly if he provides evidence which is false and which he knows or believes to be false, he is liable to be punished under section 191 of the Indian Penal Code.
9. To affix his signature on the recorded statement, inventories and the panchanama.
10. To ensure that peace is maintained throughout the duration of the search and to cooperate with the search party in all respects so that the search action is concluded at the earliest and in a peaceful manner.
11. Similar cooperation should be extended even after the search action is over, so as to enable one authorised officer to complete necessary follow-up investigations at the earliest.

Date:

Witness : 1

Time:

Witness : 2

Countersigned


Ramprasad Choudhary

PANCHNAMA
(To be prepared quadruplicate)

- (A) Warrant in the case of : Sh. Nirmal Kumar Jain, Shri
Dipesh Jain and Jainesha Jain
- (B) Warrant to search : 188, Tagore Nagar, Sector-4,
(Details & ownership of place of Hiran Magri, Udaipur
search) RAJASTHAN
Telephone Numbers
- (C) (A) & (B) stated to be assessed by : (A)
(B)
- (D) Search Party consisting of :

AUTHORISED OFFICERS

- | Name | : Full Designation |
|---------------------------|-------------------------------|
| 1. Smt. Prerana Choudhary | : DDIT(Inv.)-1, Jodhpur |
| 2. Sh. R.P. Choudhary | : ITO, NaFAC 1(1)(2), Bikaner |

Other officials who assisted the authorized officers

- | | |
|-----------------------|-------------------------------|
| 1. Sh. Ashutosh | ITI, AU 1(1)(1), Ajmer |
| 2. Sh. Kamlesh Seervi | ITI(Inv.), Jodhpur |
| 3. Sh. Arun Parsoya | ITI, (Inv.), Jodhpur |
| 4. Sh. Prashant Mawar | Sr. TA, Central Circle, Ajmer |
| 5. Sh. Dwivesh | Steno, (Inv.), Jodhpur |
| 6. Sh. Ashok Meena | Steno, (Inv.), Jaipur |

(E) **Name & complete address of Panchas:**

- | | |
|---|--|
| 1. Sh. Shanti Lal
1, Reti Stand, Central Area
Udaipur
9829040200 | 2. Sh. Ashok Kumar Jain
E-21, Durga Nursery Road, Shastri
Nagar, Shiv Park Colony, Udaipur
9414157211 |
|---|--|

Rampal
Rampal Choudhary
Income Tax Officer
Ward 1(1)(2), ReAC, Bikaner

On being called by **Smt. Prerana Choudhary, DDIT (Inv.)-I, Jodhpur** on 23/11/2022 at 7:15 A.M., we the above named Panchas, presented ourselves at the above place of search. The Authorized Officer showed the warrant of authorization dated 22/11/2022 issued under section 132 of the Income-tax Act, 1961/37A of the W.T. Act, 1957 in the case of (A) above, to search the place mentioned at (B) above and duly signed and bearing the seal of the ~~Director General of Income-tax(Inv.)~~/**Pr. Director of Income-Tax(Inv.), Jaipur** to **Sh. Nirmal Kumar Jain** who was present in the said place at the time and who after reading the said authorization/after the authorization was explained in local language viz. **Hindi** by **Smt. Prerana Choudhary, DDIT (Inv.)-I, Jodhpur** signed it, in our presence and along with us in token of having perused the same.

2. ~~As today's search was in continuance of the proceedings on _____, we, along with the aforesaid officers, before the commencement of proceedings today, inspected the seals which had been placed on that date and found them to be intact/tampered with as narrated in the enclosure.~~

3. The above mentioned search party offered themselves for personal search before commencing the search, which was taken.

4. A search of the above mentioned place was carried out by the said party in our presence in an orderly manner without hurting the sentiments of any of the occupants of the premises. Nothing untoward/~~the events narrated in the enclosure~~, happened in the course of the search. (As per running punchnamas)

5. In the course of the search.

(a) The following were found and seized:

- (i) Books of account and documents as per inventory in annexure 'AS' (1 Sheet)
- (ii) Bullion i.e. gold, silver etc. as per annexure 'B' (NIL).
- (iii) Cash as per annexure 'C' (NIL).
- (iv) Jewellery, ornaments etc. which have been inventoried separately for each place from where recorded, as per annexure 'JS' (1 Sheet)
- (v) ~~Silver articles and silverware as per inventory in annexure 'S' (NIL)~~
- (vi) ~~Other valuables, locker keys, F.D. Rs. etc. as per inventory in annexure 'O' (NIL)~~

W-1
W-2

Party

A.O.

Rampal Choudhary
Income Tax Officer
123, R.C. Bldg

(b) **The following were found :**

- (i) ~~Books of account and documents as per Annexure 1. Marks of identification were placed on these and the specimen of the marks and the pages where these have been placed are shown in the inventory prepared.~~
- (ii) The other valuable articles or things (including money) and stock as per annexure CJF & CF (separate inventories of jewellery, ornaments, silverware etc. were prepared for items found in different places or claimed to be belonging of different person)

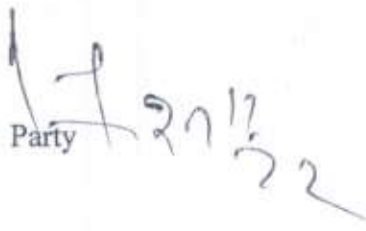
6. In the course of the search the authorized officer **Smt. Prerana Choudhary, DDIT (Inv.)-I, Jodhpur & Shri R.P. Choudhary, ITO** recorded the statement(s) of **Sh. Nirmal Kumar Jain** on solemn affirmation/oath, in our presence. No coercion, threat, inducement, promise or other influence was brought to bear on the above deponent. The statement was read over/explained in the local language viz. **Hindi** to the deponent who signed the statement in token of having understood its content and of agreeing that it has been correctly recorded.


7. The following other important persons were present in the place of search and either took an active part in or helped in the search proceedings:

<u>Name</u>	<u>Relationship</u>
1. Sh. Jagdish Chand Jajoo	Authorized Valuer
2. Arun Tiwari	Forensic Expert

W-1 

W-2 

Party 


A.O.
Rampal Choudhary
Income Tax Officer
Ward 10, ReAC, Bikaner

8. The search commenced on 23/11/2022 at 7:15A.M. The proceedings were closed on 27/11/2022 at 11:45A.M. as ~~finally concluded~~/as temporarily concluded for the day to be commenced subsequently for which purpose three seals were placed ~~on the entire place~~/on wooden almirah in wall of north-west corner room situated at ground floor of residence of Shri Nirmal Kumar Jain in our presence.

9. An order under section 132(3) of the I.T. Act, 1961 in respect of the sealed ~~premises/lockers/bank A/c~~ wooden almirah in wall of north-west corner room situated at ground floor of residence of Shri Nirmal Kumar Jain which was served on Shri Nirmal Kumar Jain by the said authorized officer.

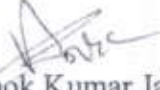
10. Before leaving the above-mentioned place of search, the entire search party again offered themselves for personal search which was taken. The above panchnama has been read by us/explained to us in local language viz. Hindi by Smt. Prerana Choudhary, DDIT (Inv.)- I, Jodhpur & Sh. P. R. Choudhary and it is certified that it has been correctly recorded.

PANCHAS:

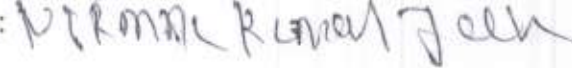
1 Sh. Shanti Lal 
1, Reti Stand, Central Area
Udaipur
9829040200

(Signature of the Authorized Officer)

Name : Rampal Choudhary
Designation: Tax Officer
Date: Ward 1(1)(2), ReAC, Bikaner

2 Sh. Ashok Kumar Jain 
E-21, Durga Nursery Road, Shastri
Nagar, Shiv Park Colony, Udaipur
9414157211

(Signature of the person receiving the copy of Panchnama)

Name : Nirmal Kumar Jain 

Designation :
Position in /relation
to at 'A' :

Date :

SEAL

DIN:- DIT (Inv.)/JPR/DIN/Approved/NS/UDR/Unit-2/22-23/01 तारी. 21/11/22

आयकर अधिनियम, 1961 की धारा 131 के अधीन निर्धारिती का सम्मन गवाह

Summons to Assessee Under Section 131 of the Income-tax Act, 1961
Witnesses

सेवामें / To.

तारीख/Dated... 26/11/22

श्री निर्मल कुमार
188, टैगोर नगर, हिरण नगरी,
उदयपुर।

चूंकि आपके अपने मुकदमे/.....के मुकदमें में आयकर अधिनियम के अधीन की जाने वाली कार्रवाई के सम्बन्ध में आपकी उपस्थिति अपेक्षित है। इसलिए एतद् द्वारा आपको सूचित किया जाता है, आप स्थान उदयपुर में 5-5 सबितरी रेडर उदयपुर पर स्थित मेरे कार्यालय में तारीख 26/11/2022 को 5:30 बजे पू./अ. में साक्ष्य देने के लिए और/या स्वयं या किसी अधिकृत प्रतिनिधि द्वारा पीछे की और निर्दिष्ट खाता बहियों/या अन्य प्रलेखों को पेश करने के लिए उपस्थित हों और तब तक मौजूद रहे जब तक वहाँ से जाने के लिए मेरी अनुमति प्राप्त न हो उस समय लागू कानून के किसी उपबन्ध पर कोई विपरीत प्रभाव डाले बिना यदि आप जान बूझकर उपस्थित न होंगे और साक्ष्य न देगे या बही-खाते प्रलेख पेश नहीं करेंगे तो आप पर आयकर अधिनियम 1961 की धारा 272A-(1)(C) के अधीन 10,000 रु. तक जुर्माना किया जा सकता है।

Whereas your attendance is required in connection with the proceeding under the Income-tax Act in your case/the case of..... you are hereby required personally to attend my office at..... on the..... day of..... 20..... at..... 'O' clock A.M./P.M. there to give evidence and/or to produce either personally or through any authorised representative, the Books of account or other documents specified overleaf and not depart until you receive my permission to do so. Without prejudice to the provisions to any other law for the time being in force if you intentionally omit to so attend and give evidence or produce the books of account or documents a fine up to Rs. 10,000/- may be imposed upon you under section 272-A (1) (C) the Income-tax Act 1961.

आपके सफर खर्च के लिए रकम जमा करा दी गई है।

A sum has been deposited for your travelling expenses.

Vinod
आयकर अधिकारी/Income-tax Officer
सहायक निदेशक आयकर/Asst. Dir. of I.T.
आयकर अधिकारी/Income-tax Officer
उप-निदेशक आयकर/Dy. Dir. of I.T.

VINOD CHOUDHARY
Director of Income Tax (Inv.)-1
Udaipur (Raj.)

खाता बहियों और प्रलेख जो प्रस्तुत किए जाने हैं
Register of Account or Documents to be produced

प्रप्त/जब्त लेखा बहियों आदि की सूची/फेहरिस्त
 List Inventory of A/C Book etc., Found/Seized

मेसर्स/श्री/श्रीमती Akme Fintrade India Ltd, Akme Fincom Pvt Ltd, Akme
 Samodaya Nidhi Ltd, Akme Dreamventures Pvt Ltd, Star Housing
 के मामले में Akme Business Centre, 4-5 Subcity (स्थान का नाम) से प्रप्त/जब्त/लेखा/बहियों
 दस्तावेजों आदि की सूची :- centre, Savine, OPP. Krishna Mandi Akme Buildmart Pvt Ltd,
 Udaipur Akme Automobiles Pvt Ltd.

क्र.सं. S. No.	विवरण Description	कुल पृष्ठ Total Pages	अवधि/Period		पृष्ठ जिन पर पहचान चिन्ह लगाये गये Pages on which Identification marks placed
			से/ From	तक/ To	
①	Bunch of loose papers	6	-	-	Cover page
②	Bunch of loose papers	102	-	-	Cover page
③	Bunch of loose papers	13	-	-	Cover page
④	Bunch of loose papers	86	-	-	Cover page
⑤	Bunch of loose papers	297	-	-	Cover page
⑥	2013 diary	216	-	-	Cover page
⑦	Backup of - Two External Harddisk one working, one master *finance@aaasonloans.com *nirmalkjain@aaasonloans.com *Lenovo laptop 1TB SSD *Seagate external 500GB HDD *Jaguar 360 Cloud.	-	-	-	Cover page
⑧	Back up - Two external harddisk one working, one master copy * 5 emails *Basanti Lenovo Desktop *Server Room Seagate External 1TB HDD *Reports of Basanti Jain ERP Cloud Data.	-	-	-	
			कुल योग		

संलग्नक AS पृष्ठ 2 of 2
 तलाशी / सर्वेक्षण की तारीख 23/11/2022

प्राप्त/जब्त लेखा बहियों आदि की सूची/फेहरिस्त
 List Inventory of A/C Book etc., Found/Seized

मैसर्स/श्री/श्रीमती Akme Fintrade India Ltd, Akme Finance Pvt Ltd, Akme Sarvodaya
 Nidhi Ltd, Akme Dream ventures Pvt Ltd, Star Housing Finance Ltd,
 के मामले में Akme Business Centre, 4-5 Sub City (स्थान का नाम) से प्राप्त/जब्त/लेखा/बहियाँ
 Akme Dr. Co. Homes LLP,
 दस्तावेजों आदि की सूची :- Centre, Sarina, Opp. Krishna Mandi Akme Build mart Pvt Ltd,
 Udaipur Akme Automobiles Pvt Ltd

क्र.सं. S. No.	विवरण Description	कुल पृष्ठ Total Pages	अवधि/Period		पृष्ठ जिन पर पहचान चिन्ह लगाये गये Pages on which Identification marks placed
			से/ From	तक/ To	
9	Back up of - Dell Server 2012 Second Floor Two - one working, one master	-	-	-	Cover page.
10	Back up of - Seagate External 500GB SN. Seagate External 500GB HDD Two - one working, one master copy.	-	-	-	Cover page.
11	Back up of Kailash. lenovo All in One PC. 1TB HDD, 4 th Floor Two - one working, one master copy	-	-	-	Cover page.
12	Backup of Akme NAS Server 3 6TB external Harddisk * Master copy * working copy * Raw Data	-	-	-	Cover page.
			कुल योग		

RECORD OF SURVEY PROCEEDINGS

- (A) Authorization in the case of: Akme Finttrade India Limited, Akme Fincorn Pvt Ltd, Akme Sarvodaya Nidhi Ltd, Akme Sarvodaya
- (B) PAN, TAN, Address & Telephone Numbers: Dream ventures LLP, Star Housing Finance Limited, Akme. Dreamhomes LLP, Akme Buildmax Pvt Ltd, Akme Automobiles Pvt Ltd.
- (C) Assessed by:
- (D) Survey party consisting of: Address → Akme Business Centre, 4-5 Subcity Centre, Savina, Udaipur

S.No.	Name	Full Designation
1	Vinod Choudhary	DDIT (Inv) - I, Udaipur
2	S.D. Bairwa	ITO
3	Sikh Chand Meena	ITO
4	Vijay Kumar	ITI

The authorization for survey under Section 133 A of the Income Tax Act, 1961, in the case of (A) above to undertake survey the place mentioned at (B) above was shown and read to Mr. Prabhulal who was present at the premise at the time of commencement of survey. After the authorization was explained in local language it was duly signed by him/her.

2. The above mentioned survey party offered themselves for personal search before commencing the survey which was taken/ ~~declined~~
3. Survey of the above mentioned place was carried out by the survey party in an orderly manner without hurting the sentiments of any of the occupants of the premises. Nothing untoward happened in the course of the survey.
4. In the course of the survey

The following were found and inventoried* :

- Books of account and documents as per Annexure 'A' (..... Sheets)
- Stock inventories as per annexure 'B' (..... sheets)
- Cash as per annexure 'C' (..... Sheets)
- Any other item.

B) The following were found and impounded*:

Books of account and documents as per Annexure AS (Marks of identification were placed on these and the specimen of the marks and the pages where these have been placed are shown in the inventory prepared.) Annexure AS (two sheets)

*Format for preparation of inventory enclosed)

5. If the course of the survey the authorized officer Mr. Vinod Choudhary, DDIT recorded the statements of Mr. Nirmal Kumar Jain, Kaikash Dangle, Anil Jain, Rajni. No coercion, threat, inducement, promises or other influence was brought to bear on the above deponent. The statement was read over/ explained in the local language viz. Hindi to the deponent who signed the statement in token of having understood its contents and of agreeing that it had been correctly recorded.
6. Before leaving the above mentioned place of survey the entire party again offered themselves for personal search which was taken/ ~~declined~~. No cash/other valuables was removed by the survey team from the premise. The above record of survey proceedings has been read by us/ explained to us in local language viz. Hindi by Mr. Vinod Choudhary, DDIT and is certified that it has been correctly recorded.

Signature of the Authorised officer

Signature of the person receiving the copy of the Record of survey proceedings

iii. Inventory of cash found during survey carried out on (date of survey)

Particulars of cash found in the case of M/s.....at
 (Address).....

S. No.	Bundle No./Dt.	Denomination	No. of pieces	Amount
<i>Nil</i>				

Signature of authorized officer
 (with name and designation)
Vinod Chandra
 Dy. Director of Income Tax (Inv.)-I
 Udaipur (Raj.)

Signature of the party
 (with name and position)
P. P. 27/12

IV. List/inventory of other assets found during survey carried out on (date of survey)

In the case of M/s.....
 at (address).....

S. No.	Description of articles	No.	Metal (if applicable)	Gross wt. (if applicable)	Estimate Net wt. (if applicable)	Value (in Rs.)
<i>Nil</i>						
Total (Wherever Applicable)						

Signature of authorized officer
 (with name and designation)
Vinod Chandra
 Dy. Director of Income Tax (Inv.)-I
 Udaipur (Raj.)

Signature of the party
 (with name and position)
P. P. 27/12

V. Inventory of stocks found during the course of survey carried out on (date of survey)

In the case of M/s.....at
 (address).....stock was found as under:

S. No.	Description	Quantity (in Nos./ wt.)	Value (in Rs.)	Basis of valuation	Remarks
<i>Nil</i>					

It is verified that the stock has been inventorized by (name of official).....in the presence of (name of person and his relation with the assessee).....and has been correctly recorded.

Name & address of the assessee : Akme Fintrade India Ltd, Akme Fincom Pvt Ltd, Akme Sarvodaya Nidhi Ltd
Address - Akme Business Centre, U-5 Subcity Centre, Savina, Opp. Krishi Mandi Udaipur
Status :
PAN No. :

Impounding order U / s 133A (3) (ia) of the Income tax act, 1961.

A survey U /s 133A of Income tax Act, 1961 was conducted at the business premise... Akme Business Centre, U-5 Subcity Centre, Savina, opp. Krishi Mandi, Udaipur... occupied by Akme Fintrade India Ltd, Akme Fincom Pvt Ltd etc. on the date 23/11/2022

During the survey proceedings, certain incriminating documents/ diaries/ registers/ loose papers/ books of accounts etc. were found which could not be verified from the regular books of assessee and no satisfactory explanation could be furnished by the assessee regarding the contents. These incriminating documents have been inventorised as Annexure "AS (Exhibit..... 1..... to..... 12.....)

These documents not being verifiable are hereby impounded U /s 133A (IA) (ia) of the I.T. Act, 1961 for further examination and verification.

✓ Copy to assessee

* Akme Dream ventures Pvt Ltd, Star Housing Finance Limited, Akme Dreamhomes LLP, Akme Buildmart Pvt Limited
Akme Automobiles Pvt. Limited

sd
Signature of the Authority
VINOD CHOUDHARY
Dy. Director of Income Tax (Inv.)-I
Udaipur (Raj.)

Signature of the Authority

Vinod
VINOD CHOUDHARY
Dy. Director of Income Tax (Inv.)-I
Udaipur (Raj.)